

Appendix U. Environmental Compliance Monitoring Plan

Environmental Compliance Monitoring Plan

Ruby Pipeline Project

May 2010

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List of Abbreviations

BLM – Bureau of Land Management

Certificate – FERC Certificate of Public Convenience and Necessity

Checklist – Compliance Checklist

FERC – Federal Energy Regulatory Commission

PFYC – Potential Fossil Yield Classification

Plan – Environmental Compliance Monitoring Plan

POD – Plan of Development

Program – Environmental Compliance Monitoring Program

Project - Ruby Pipeline Project

Reclamation – Bureau of Reclamation

ROW – Right-of-Way

Ruby – Ruby Pipeline, L.L.C.

USFS – United States Forest Service

Introduction

Ruby Pipeline, LLC (Ruby) anticipates beginning construction of the Ruby Pipeline Project (Project) in June 2010. The Project is an approximately 675-mile natural gas pipeline that begins in Opal, Wyoming, crosses through northern Utah and Nevada, and terminates in Malin, Oregon (Appendix A). The 42-inch pipeline will cross an estimated 344 miles of federal public land administered by the Bureau of Land Management (BLM), Bureau of Reclamation (Reclamation), and the United States Forest Service (USFS). This includes about 20.4 miles in Wyoming, 49.9 miles in Utah, 240.5 miles in Nevada, and 31.1 miles in Oregon. The Project also includes a 2.6-mile lateral pipeline, four new compressor stations (in addition to the existing King Compressor Station), and additional aboveground facilities (Appendix B).

The Federal Energy Regulatory Commission (FERC) issued a Certificate of Public Convenience and Necessity (Certificate) for the Ruby Pipeline Project on April 5, 2010. FERC will be responsible for enforcing any Certificate conditions. The BLM issued a right-of-way (ROW) grant on [date] for the pipeline crossing on federal lands. The BLM is responsible for enforcing the ROW grant terms and conditions on federal lands. Several other federal, state, and local agencies have also issued permits to Ruby for the pipeline's construction and have jurisdictional interest in monitoring environmental compliance in relation to their respective permit, approval and mitigation requirements. In addition, Ruby has agreed to provide suitable bond commitments to assure completion of satisfactory reclamation for the Project. The BLM is developing and finalizing the required commitments and will include these in the Record of Decision for the Project.

Prior to beginning project construction, Ruby will assemble an environmental inspection team to oversee all aspects of Project construction and to provide training to the construction, inspection, and monitoring work force. Ruby's inspection team will include Environmental Inspectors and other team members to ensure full compliance with the FERC Certificate and all requirements and mitigation measures contained in the Project's Plan of Development (POD), other Project documents, and multiple agency permits and authorizations. In addition, Ruby is funding a third-party environmental compliance monitoring team to work under the direction of FERC and the BLM, with close collaboration with USFS, Reclamation, and other permitting agencies, as warranted. The third-party compliance monitoring team will focus its efforts on

ensuring the requirements of the FERC Certificate and BLM ROW grant, as well as other duties as described below.

This Environmental Compliance Monitoring Plan (Plan) outlines the objectives of the Environmental Compliance Monitoring Program (Program); identifies the Program's organizational, reporting, and communication structure; clarifies the roles and responsibilities of Ruby's inspection and construction and the BLM's monitoring personnel; describes the environmental training requirements; details the compliance reporting and documentation processes and reports; outlines the Program's variance processes and procedures to account for changes from approved mitigation measures or construction procedures; discusses emergency procedures; identifies equipment needs; and identifies the threshold for when the third-party compliance monitoring contract should be ended.

Objectives

The goal of the Plan is to establish the framework and processes necessary to ensure that all environmental and other compliance requirements are achieved during construction of the pipeline and during reclamation. Ruby designed and is required to construct and operate the Project to minimize environmental impacts and to ensure compliance with environmental regulations, permit requirements, mitigation agreements, plans, specifications, and commitments. The goal of Ruby's environmental inspection team is to implement Ruby's design, construction, operational, and other requirements. The goal of the FERC/BLM joint third-party Program is to monitor and document Ruby's compliance and/or non-compliance with the Project's environmental and other requirements during construction as documented by:

- environmental and other mitigation measures that were agreed to by Ruby throughout the planning and permitting phases of the Project;
- stipulations in the Certificate issued to Ruby by FERC;
- stipulations in all federal agency Record of Decision, ROW grant, and Notice-to-Proceed documents;
- construction procedures and mitigation measures included in the Final POD (appended to the ROW grant) issued by the BLM; and
- terms and conditions of the United States Fish and Wildlife Service Biological Opinion.

Compliance Checklist

Ruby is responsible for correcting all instances of non-compliance initiated by its employees or construction contractors. Prior to conducting the compliance training, Ruby will prepare a detailed Compliance Checklist (Checklist) listing all individual permitting and mitigation requirements contained in documents listed above. The Checklist will serve as a reference document, ensure that all personnel are aware of the Project's environmental requirements and assist inspection, construction, and monitoring staff in recognizing and resolving non-compliance issues. A summary the Checklist is appended to this Plan (Appendix C). The Checklist will be incorporated into a Google application that provides detailed requirements in a spatially referenced format. The checklist will be updated by Ruby if permitting or other requirements contained in documents listed above have been omitted. Updated Checklists will be dated, redistributed to all Project personnel, and attached to this plan as part of Appendix C.

Agency Authority

FERC is the lead federal agency for the Project, but both FERC and the BLM have responsibilities for compliance monitoring. FERC is responsible for ensuring that the Project is constructed and operated in compliance with the terms and conditions of the FERC Certificate. The BLM is responsible for ensuring that the Project is constructed and operated in compliance with the ROW Grant for pipeline crossings over federal lands, including land managed by: the BLM's Kemmerer Field Office, Wyoming; Salt Lake Field Office, Utah; Elko and Winnemucca Field Offices, Nevada; Lakeview Resource Area and Klamath Falls Field Office, Oregon; and Surprise Field Office, California; USFS' Fremont-Winema National Forests, Lakeview, Oregon and Uinta-Wasatch-Cache National Forest, Ogden, Utah; and Reclamation's Klamath Basin Area Office, Klamath Falls, Oregon.

The third-party compliance monitoring team functions as an on-the-ground agent of the BLM and FERC. The Compliance Monitors work under the direct supervision and control of the BLM and FERC. Their role is to observe work activities, bring non-compliance to the attention of the appropriate party, and offer recommendations on how to prevent or correct non-compliance. No direction with respect to times, places, or manner of conducting monitoring will be given to the third-party compliance team from the Ruby environmental inspection team or construction contractors. The monitoring team does not direct the work of construction contractors or other personnel involved in Project construction. The compliance monitoring team and the

environmental inspection team will work together to ensure timely and effective Project compliance, which will in turn, help to expedite project construction.

In the event of differences of opinion or disagreements about compliance issues, FERC will consult with appropriate federal, state, county and municipal regulatory agencies, as well as other parties, to establish a resolution to the issue.

Stop Work Authority

Ruby's construction and environmental management teams and FERC and BLM Project Managers have authority to stop a construction activity that is determined to deviate from the Project's environmental requirements by impacting resources, putting resources at risk, or be a clear violation of environmental or other permit requirements. These federal agencies may delegate this authority to the Compliance Manager and the Compliance Monitors. Reclamation and USFS Project Managers would also have the authority to stop work on lands and facilities under their jurisdiction when it is determined that a deviation from the Project's environmental requirements impacts resources, puts resources at risk, or is a clear violation of environmental or other permit requirements. The stop work process and procedures are discussed later in this Plan.

Construction Plan

At the current time, Ruby plans to construct the natural gas pipeline in seven construction spreads (Appendix D). This includes one spread in Wyoming, two spreads in northern Utah, three spreads in northern Nevada, and one spread in southeast Oregon. Ruby anticipates construction to begin in spring 2010 and to extend to early 2011 with work windows organized around seasons and permitting requirements. Ruby has proposed an in-service date for the pipeline to begin operation of March 2011.

Organizational Structure and Communication

The organizational structure of the Program for the Project is shown in Appendix E. It is organized around construction spreads and includes Ruby's project management, construction management and environmental management personnel and the third-party compliance monitoring team. A complete list of all Program staff and their contact information will be compiled and finalized by Ruby's Project Manager prior to the beginning of construction and appended to this document (Appendix F). If necessary, contact information for all back-up field

personnel will also be provided. Ruby's inspection team has primary responsibility for ensuring environmental compliance of the Project. This team reports to Ruby and will work with the construction contractors to identify environmental requirements and maintain compliance.

The federal agency's third-party compliance monitoring team is responsible for monitoring construction activities on behalf of FERC and the BLM. It includes personnel from the compliance contractor, as well as FERC and BLM Project Managers. This monitoring team will work with Ruby's inspection team to clarify environmental requirements where needed, provide guidance on maintaining compliance, and review and approve variance requests within their given levels of authority.

Ruby's Inspection Team

Ruby's Inspection Team includes staff to provide project management, construction management, and environmental management functions. This team is responsible for overseeing construction contractors, construction activities, and environmental compliance.

Project Management

Ruby's Project Manager is the primary interface between Ruby's management and the construction management and environmental management teams. She/he oversees the Construction Manager, the Environmental Project Manager, and the engineering support contractors. In this capacity, Ruby's Project Manager is responsible for environmental compliance.

Construction Management

Ruby's construction management team oversees the construction and craft inspectors and the construction contractors. Their primary responsibility is to ensure that the pipeline and associated facilities are installed according to specifications.

Construction Manager

The Construction Manager oversees the construction contractors through the Spread Chief Construction Inspectors and the Construction Inspectors. The responsibilities of this position include:

- ensuring compliance with company and design specifications, permit conditions, construction contracts and applicable engineering and design codes;
- ensuring expeditious communication of construction plans and project modifications to appropriate environmental and ROW personnel;
- communicating frequently with the Project Manager and Environmental Project Coordinator to review and evaluate the implementation of environmental requirements; and
- reviewing and evaluating variance requests with the Spread Chief Construction Inspectors, Environmental Project Manager and Environmental Field Manager.

Spread Chief Construction Inspectors

The Spread Chief Construction Inspectors report to the Construction Manager and are responsible for overseeing the Construction Inspectors. Each of the seven construction spreads will have a spread office and an assigned Spread Chief Construction Inspector. Their responsibilities include:

- working with Construction Inspectors to ensure compliance with company specifications, permit conditions, construction contracts, and applicable engineering and design codes;
- evaluating and approving, at the company level, variance requests with the construction contractor;
- supervising contractor compliance with Project authorizations, including construction, safety, and environmental requirements; and
- assisting Environmental Inspectors with the maintenance of environmental compliance.

Construction Inspectors

The Construction Inspectors report to their assigned Spread Chief Construction Inspector. All construction personnel, including Construction Inspectors, are responsible for ensuring construction and environmental compliance - the latter through close coordination with Environmental Inspectors. Specifically, the responsibilities of Construction Inspectors include:

- ensuring compliance with company specifications, permit conditions, construction contracts and applicable engineering and design codes;
- conducting quality control inspections within their assigned area of responsibility; and
- assisting Environmental Inspectors with the maintenance of environmental compliance.

Construction Contractor

Each construction spread will be assigned to a construction Contractor. The Contractor's staff will include Spread Superintendents, Assistant Superintendents, and Foremen with responsibilities for ensuring construction compliance with applicable authorizations, permits, and landowner agreements. The Contractor also provides crews responsible for properly installing and maintaining erosion control devices. The Contractor's supervisory responsibilities include, but are not limited to the following.

- verifying that all construction workers participate in environmental training before working on the Project;
- overseeing the installation and maintenance of erosion control devices; and
- ensuring that all construction work complies with company specifications, contract documents, environmental permits, and landowner line list conditions.

Environmental Management

Ruby's environmental management team has primary responsibility for Project environmental compliance. This includes acquiring all applicable environmental permits and clearances, communicating with federal, state, and local agencies, and ensuring that all construction work complies with Project-specific environmental permits and agency requirements. This environmental management team includes an Environmental Project Manager, an Environmental Project Coordinator, Spread Lead Environmental Inspectors, Environmental Inspectors, and supplemental field support specialists, as required.

Environmental Project Manager

The Environmental Project Manager is responsible for overseeing Ruby's environmental compliance staff, including supervision of the Environmental Project Coordinator, Spread Lead Environmental Inspectors, Environmental Inspectors, and supplemental field support specialists. Specifically, the Environmental Project Manager's responsibilities include:

- coordinating pre-construction environmental planning and permitting;
- coordinating with Ruby's Project Managers, Construction Managers, and Environmental Project Coordinator;
- coordinating communication among the compliance monitoring team, regulatory agencies, and Ruby's construction and environmental management teams;
- ensuring that all required environmental permits and clearances are secured; and

- advising on the interpretation of all environmental permit requirements and mitigation measures.

Environmental Project Coordinator

The Environmental Project Coordinator reports to Ruby's Environmental Project Manager. This person lives in the Project area and is responsible for field coordination and oversight of Ruby's environmental inspection program, including the activities of Spread Lead Environmental Inspectors, Environmental Inspectors, and supplemental field staff. Specific responsibilities include:

- organizing and conducting Project-specific environmental training programs for contractor and company management staff prior to construction on each spread;
- supervising all Environmental Inspectors;
- managing, reviewing, and processing variance requests;
- managing the oversight and implementation all agency-mandated environmental permits and mitigation measures;
- establishing and maintaining effective communication with the construction management team;
- communicating and coordinating with the FERC and BLM Compliance Manager and Compliance Monitors concerning construction schedules, construction activities, and compliance issues;
- ~~authoring, reviewing and expeditiously distributing~~ preparing Daily and Weekly Environmental Reports ~~to the third-party compliance manager/monitor;~~
- establishing and maintaining a systematic library of all field reports including the reports prepared by Lead Environmental Inspectors, Environmental Inspectors, in-field training records of all construction personnel, unanticipated discoveries, and all other pertinent environmental-related project documentation;
- disseminating the Weekly Environmental Report to FERC and the BLM on a weekly basis and any specific Daily Environmental Report to the Compliance Manager upon request;
- managing the oversight of all non-compliance issues including documentation and correction;
- managing the oversight of all complaint resolutions concerning environmental mitigation problems/concerns during project construction and restoration;
- preparing and maintaining all environmental training programs for the Project; and

- Updating and redistributing the Checklist, as necessary.

Lead Environmental Inspectors

The Lead Environmental Inspectors report to the Environmental Project Coordinator. One Lead Environmental Inspector will be assigned to each of the seven construction spreads, and this person will be responsible for ensuring environmental compliance for that spread and supervising the activities of the assigned Environmental Inspectors. The Lead Environmental Inspectors (and Environmental Inspectors) have authority to stop work on activities that could potentially violate environmental permit and mitigation requirements contained in the FERC Certificate, BLM POD, or other authorizing permits or documents. They may also stop work on activities that are causing impacts to sensitive environmental resources as described later in this Plan. The specific responsibilities of Lead Environmental Inspectors include:

- conducting environmental training of field personnel on each spread prior to their participation on Project construction activities;
- establishing and maintaining effective communication channels with the construction management team;
- communicating and coordinating with the agency Compliance Monitors on construction activities and compliance issues;
- overseeing the contractors' implementation of environmental conditions as described in all applicable permits and approvals for the Project;
- overseeing the installation and removal of all erosion control measures, and providing photo documentation of these activities;
- overseeing crossings of flowing water bodies, and wetlands including any deviation from plans, and providing photo documentation of before, during and after restoration activities;
- overseeing the re-vegetation and restoration of ROW areas, including reseeding;
- notifying and scheduling supplemental field support personnel (biologists, archaeologists, paleontologists etc.);
- overseeing implementation of the Unanticipated Discovery Plan, including notification to appropriate Ruby and agency personnel, and installing and maintaining the exclusion zone;
- overseeing all on-site environmental training for contractor personnel conducted by environmental inspectors;

- reviewing all contractor-initiated variances, directing the initial investigation, ensuring that photo documentation occurs, and forwarding documentation to the Environmental Project Coordinator for processing;
- authoring Daily Environmental Inspection Reports, including photo documentation, and reviewing the Environmental Inspector Daily Reports before forwarding to the Environmental Project Coordinator for distribution;
- overseeing contractor spill response, including reports listing material(s) involved, quantity, location, etc.;
- overseeing installation of all Project signs necessary for environmental compliance;
- accompanying all agency personnel who visit the Project;
- identifying potential environmental issues and concerns ahead of construction activity; and
- assisting in the resolution of landowner disputes with ROW agents when requested.

Environmental Inspectors

Environmental Inspectors report to the Lead Environmental Inspector of their assigned construction spread. They have the authority to stop work on activities where the potential to violate environmental conditions and mitigation measures in the FERC Certificate, BLM POD, or other authorizing permits or documents exists. The specific responsibilities of Environmental Inspectors include:

- participating in or conducting environmental inspection training of new project hires;
- overseeing the contractors' implementation of all environmental conditions described in applicable permits and approvals for the Project;
- communicating and coordinating with the Compliance Monitors as needed;
- overseeing the installation and removal of all erosion control measures, ensuring that photo documentation occurs;
- overseeing crossings of flowing water bodies, and wetlands, including any deviation from plans, ensuring that photo documentation occurs before, during, and after restoration;
- overseeing the re-vegetation and restoration of ROW areas, including reseeding;
- notifying the Lead Environmental Inspector of all needs for supplemental field support personnel (biologists, archaeologists, paleontologists etc.);

- coordinating with the cultural resources monitor on implementation of the Unanticipated Discovery Plan, providing notification to the Lead Environmental Inspector, and ensuring that the exclusion zone is installed and maintained;
- conducting on-site environmental training of construction personnel;
- authoring Daily Environmental Inspection Reports, including updating photographic documentation, and submitting to the Lead Environmental Inspector and Environmental Project Coordinator;
- overseeing contractor spill response, including reports listing material(s) involved,
- overseeing the installation of all Project signs and environmental flagging;
- accompanying all agency personnel who visit the Project;
- attending pre-construction training and studying all Project documents when requested; and
- performing detailed reconnaissance of the ROW and access roads ahead of construction activities.

Supplemental Field Support (As Required)

Ruby will provide supplemental field support staff as needed to assist with permitting, perform additional resource surveys (wetlands delineations, cultural resources etc.) required for variance requests, observe construction activities in sensitive resource areas, and assist with environmental compliance and restoration requirements. These personnel will report to the Environmental Project Manager and Environmental Project Coordinator, and will assist the Lead Environmental Inspector and Environmental Inspectors with the identification and protection of environmental and cultural resources as follows.

- Biological Resources – Qualified biologists will be available to identify sensitive species, identify habitat that requires avoidance, conduct additional surveys to support variance requests, observe construction activities to minimize impacts on biological resources, and assist in the removal/avoidance of sensitive plants. Their specific responsibilities include the following.
 - providing technical support to assess biological resource issues that may arise and monitoring compliance relevant to biological resource protection;
 - performing specific activities requiring biological resource expertise, including pre-construction surveys, monitoring construction activities in specific areas for sensitive resources, and evaluating unanticipated discoveries;

- consulting, as necessary, with biologists experienced in identification of sensitive species and habitat;
- consulting, as necessary, with botanists experienced in native and rare sensitive plant species; and
- reporting to the Lead Environmental Inspector and providing Daily Environmental Inspection Reports to the Lead Environmental Inspector.
- Cultural Resources – Qualified and permitted archeologists will be available to identify sensitive cultural resources that require avoidance, conduct additional surveys to support variance requests, and observe construction activities to minimize impacts on cultural resources. Their specific responsibilities include the following.
 - providing guidance on the monitoring provisions in any applicable mitigation plan to ensure compliance with the cultural resource protection measures and objectives;
 - performing specific activities requiring cultural resource expertise, such as monitoring construction activities in specific areas for sensitive resources and evaluating emergency discoveries;
 - recommending appropriate actions and or mitigation regarding cultural resources in conjunction with the appropriate federal archaeologists;
 - ensuring that the provisions in the Unanticipated Discovery Plan are followed, if unanticipated discoveries are found, performing appropriate field investigations, and documenting findings in a summary field report for submittal to the Lead Environmental Inspector; and
 - reporting to and providing daily reports to the Lead Environmental Inspector.
- Paleontological Resources – A qualified and permitted paleontologist will be available to identify sensitive paleontological resources in select project areas that require avoidance, conduct additional surveys to support variance requests, and observe construction activities to minimize impacts to paleontological resources. In accordance with the Paleontological Resources Monitoring Plan, their specific responsibilities include the following.
 - overseeing the paleontological portion of the compliance training;
 - conducting or overseeing monitoring and spot checks of geologic formations classified as Potential Fossil Yield Classification (PFYC) 5, 4 and some PFYC 3 ranked strata;

- evaluating paleontological discoveries made by Ruby and construction contractors;
- determining appropriate actions regarding significant finds with BLM paleontologists and archaeologists; and
- reporting to and providing daily reports to the Lead Environmental Inspector.
- Surface Water Resources – A qualified hydrologist with knowledge and experience with pipeline construction across sensitive water bodies (including streams, lakes, wetlands, and playas) will be available to provide additional expertise to support variance requests and observe construction activities to minimize impacts to water resources. Their responsibilities include the following.
 - providing guidance on the monitoring and restoration provisions in any applicable mitigation plan to ensure compliance with the water resource protection measures and objectives (including hydrostatic testing);
 - performing specific activities requiring hydrologic expertise, such as monitoring construction activities in specific areas where sensitive water resources are present; and
 - reporting to and providing daily reports to the Lead Environmental Inspector.
- Visual Resources – Visual resource analysts will be available to conduct additional surveys to evaluate new key observation points that were not previously evaluated, observe construction activities to minimize impacts to visual resources and assist in interpretation and application of visual mitigation measures. Their specific responsibilities include the following.
 - providing technical support to assess visual issues that may arise and monitoring compliance with visual resources guidance documents, such as expansion or relocation of contractor use areas, alteration of compressor station design, widened clearing limits in Class I or Class II lands, construction of new access roads, etc.;
 - performing specific activities requiring analytical visual expertise and working knowledge of the BLM Visual Resources Management system;
 - consulting with BLM resources specialists, district staff and stakeholders; and
 - reporting to and providing daily reports to the Lead Environmental Inspector.

Agency Compliance Monitoring Team

As previously stated, both FERC and the BLM have compliance monitoring responsibilities associated with the Certificate and ROW Grant, respectively, issued for the Project. Additionally, the BLM and FERC have primary responsibility for managing the third-party compliance contractor on this Project including the Compliance Manager and Compliance Monitors. Other federal, state, and local agencies also have compliance monitoring responsibilities tied to their jurisdictional and permitting responsibilities. While not an “official” part of the joint third-party compliance monitoring team, these agencies will have the opportunity to provide input and recommendations to the FERC/BLM monitoring team, including the monitors in the field.

FERC/BLM Project Managers

FERC and the BLM will have primary project management responsibilities for compliance monitoring. Other federal, state, and local agencies with permitting and regulatory responsibilities tied to the Ruby Project should assign a designated point of contact for the purpose of consultations regarding this Compliance Plan. As the lead federal agency for the Project, the FERC Project Manager is recognized to have overall compliance oversight responsibility in relation to its Certificate. The BLM Project Manager will provide compliance oversight for the ROW grant across all federal lands with consultation with the designated USFS and Reclamation points of contact in relation to their land management jurisdictions. The FERC and BLM Project Managers will coordinate with agency points of contact to ensure timely distribution of information.

Third-Party Compliance Manager

[The Compliance Contractor] will provide overall management of the Program for the Project as a representative of FERC and the BLM. The Compliance Manager will work closely with the BLM and FERC Project Managers throughout the duration of the Program contract. The Compliance Manager will regularly communicate with the BLM and FERC Project Managers on the progress of the Plan tasks and deliverables, and resolve issues expeditiously. The Compliance Manager will be responsible for identifying any potential changes to the third-party contract scope, schedule or budget as soon as possible, and communicate that information immediately to the BLM and FERC Project Managers. BLM and FERC guidance will be followed

when preparing all Project-related compliance materials. The Compliance Manager's responsibilities include:

- reporting directly to and communicating frequently with the BLM and FERC Project Managers and designated points of contact for other federal, state, and local agencies;
- communicating and coordinating with the FERC and BLM Project Managers;
- overseeing field management of third-party Program;
- preparing BLM's Program materials;
- participating in Ruby's pre-construction environmental training program;
- supervising compliance monitoring activities, materials, and schedules;
- supervising Compliance Monitors;
- providing guidance on and review of compliance issues;
- ensuring that all non-compliances are tracked for resolution by Ruby;
- providing expeditious review and processing of variance requests;
- reviewing, approving and distributing correspondence, scope of work and schedule changes, Daily Compliance Monitoring Reports, and Weekly Compliance Monitoring Reports to FERC and BLM Project Managers ;
- reviewing compliance monitoring work progress, schedules, and budgets;
- serving as the contact between FERC, the BLM, and Ruby;
- serving as the FERC and BLM representatives to permitting agencies, private landowners, and special interest groups regarding Project compliance and mitigation;
- coordinating with FERC, the BLM, the USFS, Reclamation, and other agencies as needed to review and approve variance requests;
- working with Ruby's Environmental Project Coordinator to ensure environmental compliance; and
- maintaining the master copy of this Plan.

In coordination with the FERC and BLM Project Managers, the Compliance Manager will plan and maintain a systematic field presence to assess the overall ROW condition and ensure consistency in compliance monitoring and reporting across construction spreads. In addition to having a planned schedule for field visits, the Compliance Manager may be called upon to make ad hoc site visits for issue resolution, emergency events, and other occasions as needed.

Compliance Monitors

[The Compliance Contractor] The third-party compliance contractor will provide one Environmental Compliance Manager, seven experienced Compliance Monitors, two support staff that can provide support for the Environmental Compliance Manager and Compliance Monitors and are also qualified Compliance Monitors (e.g. can act as floating Compliance Managers) for on-site, third-party compliance monitoring for the duration of project construction and initial restoration. These numbers may be adjusted depending on site-specific issues and construction and restoration progress. The Compliance Monitors report directly to the Compliance Manager and indirectly to the FERC and BLM Project Managers.

The Compliance Monitors are responsible for monitoring all construction and restoration activities for the purpose of verifying compliance or non-compliance with the Project's environmental permitting and mitigation measures, and to fulfill daily reporting responsibilities. The Compliance Monitors are familiar with natural gas pipeline construction and reclamation, and with the affected natural and cultural resources in the Project area. Their responsibilities include the following.

- participating in the environmental compliance training;
- monitoring construction activities for compliance (or non-compliance) with the FERC Certificate and the BLM POD;
- maintaining open and frequent communication and coordination with Ruby's Lead Environmental Inspectors and Environmental Inspectors;
- maintaining open and frequent communication and coordination with the Compliance Manager and the FERC and BLM Project Managers;
- preparing Daily Compliance Monitoring Reports including documentation of compliance (or non-compliance) with construction activities;
- coordinating with the Compliance Manager to provide expeditious review and approvals of Level 1 Variance requests;
- providing support to the Compliance Manager regarding Level 2 Variance requests; and
- providing guidance for addressing Level 3 Variance requests.

Compliance Monitors need to be in the field during construction activities. Administrative tasks should be conducted outside of construction activities. Compliance Monitors will need to report to the Project site with all of the necessary equipment, including vehicles, in working order. If for

some reason a Compliance Monitor must leave the Project for more than one day, a substitute Compliance Monitor must be provided by the third-party contractor, until they can return. If the Compliance Monitor must leave the Project, they must notify the FERC or BLM Project Manager.

Environmental Compliance Training

The Program for the Project will include a multi-faceted compliance training program developed by Ruby. This training will occur prior to the beginning of construction and will be conducted by Ruby's inspection team, with participation from federal agency representatives where needed. Ruby shall invite other jurisdictional agencies, including state, county, and municipal regulators, to the training sessions to provide information of local jurisdictions and discuss their participation in the environmental compliance monitoring program.

All field personnel will be required to participate in the compliance training prior to beginning work, and documentation of staff participation will be necessary. Each individual that successfully completes training will be issued an environmental training hard hat sticker and will be required to display this sticker throughout construction activities.

Training for Environmental Inspectors and Compliance Monitors

Prior to the start of pipeline construction activities, Ruby's Environmental Project Coordinator and Lead Environmental Inspectors will conduct environmental compliance training for Environmental Inspectors ~~and~~ the agency compliance monitoring team, and supervisory personnel. The training will include classroom training and field review of the Project area and special site conditions. This training will provide a Project overview and will focus on personnel organization, communication and coordination, compliance requirements, construction and safety procedures, and other related Project issues and protocols.

In addition to Ruby's training, the Compliance Contractor will provide additional training for the Compliance Manager and Monitors in all procedures, duties, responsibilities, reporting requirements and authorities, including the authority to grant variances, and to complete their assigned tasks.

Training for Spread Supervisors

The classroom training session described above will be followed by spread-specific trainings. These trainings will also be conducted by Ruby's environmental inspection team prior to the start of pipeline construction activities. These training sessions will also be attended by Ruby's inspection team and the agency monitoring team, as well as all construction supervisors (spread superintendents and foremen). Federal agency Project Managers and regulatory staff will also be invited to attend select field training sessions and make presentations. These training sessions will provide a review of the topics covered in the classroom session and provide spread or site-specific content concerning construction procedures, compliance issues and other topics that all participants will need to know before commencing work.

General Compliance Training

The remainder of the construction work force, not covered in either of the above training programs, will participate in general environmental compliance training at the respective spread yards. Depending on location, site- and resource-specific training needs may also be addressed. Environmental Inspectors will be responsible for conducting and documenting these various compliance trainings. Workers that are involved in pre-construction activities (surveying, contractor yard set-up etc.) will receive compliance training tailored to their activities and site conditions. Once construction is underway, all construction staff, inspection staff, and project visitors will be required to participate in an environmental briefing before entering the Project work area. Additionally, tailgate briefings will be conducted by Environmental Inspectors when crews are anticipated to encounter sensitive site conditions.

Reporting and Documentation

Daily report preparation and submittal is required of Compliance Monitors. At the end of each week, the daily reports from the inspection and monitoring teams are summarized into weekly reports by the Compliance Manager, respectively, and electronically published for team review.

Ruby's Environmental Inspector Reports

Ruby's environmental inspection team has responsibility for preparing Daily Environmental Inspection Reports (Environmental Inspectors) and Weekly Environmental Inspection Reports (Environmental Project Coordinator). Both sets of reports will be stored in an electronic

database maintained by Ruby. The weekly reports will also be filed with the FERC and distributed to the BLM and other designated regulatory and land management agencies.

Daily Environmental Inspection Reports

Each of Ruby's Environmental Inspectors is responsible for preparing Daily Environmental Inspection Reports. These electronic reports will document construction activities, ~~incidents or~~ problem areas, non-compliances/serious violations and their resolution, landowner complaints and their resolution, and agency visits. As needed, digital photographs will accompany Daily Environmental Inspection Reports to document before and after conditions and other environmental issues. The Daily Environmental Inspection Reports will be prepared in the field and then sent electronically to the Lead Environmental Inspector for review and completeness. The reviewed reports will then be sent to the Environmental Project Coordinator. The Environmental Project Coordinator or his designee is responsible for maintaining the Daily Environmental Inspection Reports in a Project database and distributing the Reports to Ruby's inspection team and the third-party Compliance Manager upon request. A sample Daily Environmental Inspection Report is provided in Appendix G.

Weekly Environmental Inspection Reports

The Environmental Project Coordinator is responsible for compiling the Daily Environmental Inspection Reports into a Weekly Environmental Inspection Report. The Weekly Environmental Inspection Reports are filed with FERC, and also distributed to the BLM and other designated agency Project Managers with permitting responsibilities associated with the Project. The Weekly Environmental Inspection Reports will be organized by construction spread, and each will include the following.

- current construction status of each construction spread, work planned for the following reporting period, and any schedule changes for work in environmentally sensitive areas;
- a list of all non-compliance observed by the Compliance Monitors or the environmental inspection team during the reporting period;
- corrective actions implemented in response to all instances of non-compliance and the effectiveness of all corrective actions implemented;
- tailgate briefings;
- a description of any landowner/resident complaints and the measures taken to resolve their concerns; and

- copies of any correspondence received by Ruby from other federal, state, or local permitting agencies concerning instances of non-compliance and Ruby's response.

A sample Weekly Environmental Inspection Report is provided in Appendix H.

Compliance Monitor Reports

The monitoring team provides compliance reports and documentation of the Program for the Project as a representative of the BLM and FERC. Their responsibilities also include preparing daily and weekly project reports that are posted on a password protected project Web site and available to FERC, the BLM, and authorized representatives of Ruby. Agency project managers will provide access information to other federal, state, and local agency representatives as appropriate.

Daily Compliance Monitoring Reports

Each work day, the Compliance Monitors will each complete an electronic Daily Compliance Monitoring Report documenting the Project-related activities she/he inspected that day. All Daily Compliance Monitoring Reports, consisting of all compliance levels and photographic documentation, will be available each day and will provide the agency and company representatives with a record of construction progress, photographic documentation, and documentation of compliance with the project environmental requirements. The Compliance Monitor will document the:

- milepost and station number;
- the presence of threatened or endangered species and habitat;
- the presence of perennial, intermittent, and ephemeral surface water bodies including playas, playa lakes, springs and wetlands;
- the presence of culturally sensitive sites;
- the presence of paleontological findings;
- a description of any landowner concerns; and
- a brief description of the activities observed.

When appropriate, relevant digital photographs (documenting time, Universal Transverse Mercator coordinates and date) will be taken and included in the daily report. A sample Daily Compliance Monitoring Report is included in Appendix I.

Each separate activity monitored and documented in a Daily Compliance Monitoring Report will be assigned a compliance level as described below.

- Communication
- Acceptable
- Problem Area
- Non-compliance or
- Serious Violation.

Communication – A Communication Report would be prepared, when necessary, to document and track relevant meetings or discussions between the Compliance Monitor and agencies, landowners, company representatives, Environmental Inspectors, or contractor personnel.

Acceptable –An Acceptable Report would be submitted when a Compliance Monitor determines that an inspected area or activity is in compliance with the Project specifications and all mitigation measures have been adequately implemented.

Problem Area – A Compliance Monitor would prepare a Problem Area Report to record an observation that a location or activity does not meet the definition of acceptable but is not non-compliance. The Problem Area category would be used to report on a range of events and observations including:

- an incident that is accidental or unforeseeable but is not out of compliance with the Project specifications and the company's response is appropriate and timely. An example would be a fuel leak where Project personnel respond properly by stopping, containing, and cleaning up the spill in accordance with the Project specifications.
- a location where the Project is not out of compliance with the specifications but, in the judgment of the Compliance Monitor, damage to resources could occur if corrective actions are not taken. Some examples include:
 - a silt fence with substantial build up of soil,
 - a slope with insufficient waterbars,
 - a subsoil pile on the verge of covering a topsoil pile, and
 - an improperly constructed/located dewatering structure.
- an activity that the Compliance Monitor determines is an unintentional, isolated, departure from the Project specifications, with no damage to resources. An example would be a small amount of soil or slash off the ROW that has no effect

on sensitive resources such as designated wildlife habitat, wetlands, or waterbodies.

If a Problem Area is resolved in a timely manner it will not be considered in non-compliance. If a Problem Area is found to be a repeat situation or multiple occurrences of a similar nature, is not corrected within the established timeframe, or results in resource damage because timely corrective action failed to occur, the Compliance Monitor may subsequently document the problem area as a non-compliance. The Compliance Monitor will inform the environmental inspection/construction staff about the problem before issuing the Problem Area report. Problem Areas would be documented by the Compliance Monitor and reported to the Environmental Inspector. The Environmental Inspector and Compliance Monitor shall discuss and agree upon a reasonable timeframe for resolution. The Environmental Inspector will maintain a list of identified Problem Areas, the corrective action timeframe, and the corrective actions taken.

Non-compliance – A non-compliance report would be issued when a Compliance Monitor observes an activity that violates (is not in compliance with) the Project specifications, results in damage to resources, or places sensitive resources at unnecessary risk. Some examples of Non-compliance include:

- failure to install or maintain required erosion control devices,
- ground-disturbing activities conducted outside the approved ROW limits, or
- use of unapproved access roads.

The Compliance Monitor would notify an Environmental Inspector about a non-compliance before issuing a non-compliance report that would include the name of the Environmental Impact and time of notification. In a follow-up report, the Compliance Monitor would document the resolution/corrective action of the Non-compliance. The Environmental Inspector will take immediate action to inform the appropriate contractor personnel, and to identify the required corrective action and appropriate priority and timeframe for completing the corrective action. Where practicable and where the nature of the non-compliance activity warrants, the Environmental Inspector will work closely and collaboratively with the other monitors (e.g., FERC/Other Agency Compliance Monitors) in accordance with the Program to determine the appropriate corrective action.

Resolution of non-compliance activities will involve close coordination between the Environmental Inspectors, the Lead Environmental Inspector, the Chief Inspector, and

contractor construction supervisory personnel to ensure that the corrective measures are properly understood and implemented. The Environmental Inspector will follow-up to confirm that corrective actions have been completed, and will document non-compliance activities and their resolution in the Daily Environmental Inspection Reports and the Weekly Environmental Inspection Reports that will be compiled and submitted to FERC as the weekly status report.

Serious Violation – A Serious Violation Report would be issued by a Compliance Monitor immediately upon observing an activity that is not in compliance with the Project specifications and causes substantial harm to resources or poses a serious threat to sensitive resources. Some examples of Serious Violations include:

- deliberately conducting an activity that results in disturbance within an exclusion zone for a sensitive resource,
- repeated or cumulative non-compliance activities that could lead to substantial impact on resources, and
- failure to correct previously-identified non-compliance activities in an established timeframe.

A Serious Violation report requires that the Compliance Manager and the FERC Project Manager participate in a conference call with the company's Environmental Project Manager and Environmental Project Coordinator to discuss the violation, the proper corrective actions, and possible follow-up enforcement actions that could be imposed. If a Serious Violation occurs, the designated federal land management agency representative, BLM Field Office Manager, and any other authorized agency representatives would participate in the conference call. Once the company documents the resolution of a Serious Violation, a Compliance Monitor would inspect the area and verify that the issue has been adequately resolved.

The Daily Compliance Monitoring Reports and relevant photo documentation completed by each Compliance Monitor will be sent electronically to [the Compliance Contractor's] database server at the end of each work day. The following morning, separate Daily Compliance Monitoring Reports will be compiled into one summary Daily Compliance Monitoring Report, reviewed by the Compliance Manager, and posted on the non-public, password-protected project website discussed later in this Plan. This system ensures accurate, consistent and well-written reports. When the reports are posted, the Compliance Manager will send an e-mail to the authorized distribution list, including agency points of contact, stating that the reports are available. The e-mail will summarize the compliance levels for the reports issued each day and

include the link to the website. FERC, the BLM, [Compliance Contractor], and authorized Ruby representatives will be included in the distribution of all compliance monitoring reports.

Weekly Compliance Monitoring Reports

The Compliance Manager will issue Weekly Compliance Monitoring Reports briefly describing the construction activities that occurred during the reporting period and summarizing by compliance level the number of Daily Compliance Monitoring Reports completed by the Compliance Monitors during the reporting period and cumulatively. The Weekly Compliance Monitoring Report will also summarize, in a tabular format, the Problem Area and Non-Compliance Reports issued by the Compliance Monitors during the reporting period and the Level 1, 2, and 3 Variances approved during the reporting period. The Weekly Compliance Monitoring Report will also summarize the net acreage of land affected by approved variances on federal land and non-federal land for the reporting period and cumulatively. A sample Weekly Compliance Monitoring Report is provided in Appendix J.

The Weekly Compliance Monitoring Report will be posted on the project website and will be placed into the public file at FERC.

Variance Procedures

Unforeseen or unavoidable field conditions will occur during construction that will require minor changes in the approved mitigation measures, ROW reconfiguration, and Ruby's construction procedures. Additionally, the need for extra work spaces and minor route realignments may arise, and may be considered, in part with land owner concurrence and land management agency approval. Changes to previously approved mitigation measures, construction procedures, and construction work areas will be conducted in the form of variance requests to be submitted by Ruby and reviewed and approved or denied by FERC, the BLM (on all federal land) or the Compliance Monitor/Manager.

To provide consistency and expedite the variance request process and reduce potential construction delays, a standardized variance request process and reporting procedure has been established. When a variance is sought, Ruby's environmental inspection team members are responsible for providing supporting documentation to the Compliance Monitor or Compliance Manager, depending on the level of the variance. The compliance monitoring team is

responsible for transmitting the supporting documentation, including a summary of prior environmental analysis and their on-the-ground perspective of the requested variance to the FERC and BLM Project Managers, for projects on federal lands. For this purpose, the compliance monitoring team will use a Variance Request Form to track variances.

The variance process will allow Ruby's inspection team to submit variances for approval, depending on the scope of the proposed modification, to the Compliance Monitor (Level 1 Variance) or the Compliance Manager (Level 2 Variance). The FERC and BLM Project Managers (on federal land only) are responsible for approving or denying a Level 3 Variance request. The compliance monitoring team is responsible for coordinating with Ruby and construction contractor(s) prior to implementing the variance modifications.

Variance Request Process

The Compliance Monitors and the Compliance Manager will participate in the variance review process, including the review and processing of Variance Request Forms (Appendix K). The type of participation required will depend upon the type of variance requested. Level 1, 2 or 3. Compliance Monitors will also be responsible for documenting variance approvals in the Daily Compliance Monitoring Report. In addition, a summary report of Level 1 and 2 approvals shall be posted to FERC's Docket on a monthly basis. Agency Project Managers will be notified of any variance requests on lands or facilities under their jurisdiction and provided the opportunity to review and comment on such requests. The exception is Level 1 Variance requests, which will be noted in the Daily Monitoring Report.

Level 1 Variance (Field Decisions) – A Level 1 Variance is a site-specific, minor change to Project specifications or mitigation measures that provides equal or better protection to environmental resources, does not alter performance-based requirements, does not violate agency requirements and does not impact new landowners. The affected area shall be within the previously surveyed corridor for cultural and biological resources. These minor variance requests can be reviewed and either approved or denied by the Compliance Monitors in the field during normal construction operations. Level 1 Variances may also be used to document and disseminate agency-directed changes to mitigation measures. Some examples of a Level 1 Variance include:

- changing areas required for topsoil stripping;

- shifting extra workspace along the construction ROW for a short distance within the previously surveyed corridor (without increasing land use disturbance in type or acreage or impacting cultural or environmental resources);
- allowing permanent waterbars to be extended off of the ROW into native vegetation;
- modifying setbacks at water bodies and wetlands where site-specific conditions during construction do not allow for proper placement of spoil (without impacting cultural or other environmental resources); and
- identifying areas where soil compaction testing does not need to be performed.

To initiate a Level 1 Variance request, the Environmental Inspector or other designated Ruby representative, will fill out a Variance Request Form and obtain the appropriate signatures. The Lead Environmental Inspector will then contact a Compliance Monitor to review the proposed change. The Lead Environmental Inspector and the Compliance Monitor will work together to evaluate the site-specific situation and determine if the request is appropriate.

The Compliance Monitor may approve a Level 1 Variance request if the results of implementing the change will provide equal or better protection of the resource than the original mitigation measure or if the original mitigation measure is not applicable to that specific site. If a Level 1 Variance request is approved in the field, the Compliance Monitor will sign the Variance Request Form. A Level 1 Variance request can be implemented in the field as soon as it is approved by the Compliance Monitor. In some cases, the Compliance Monitor may grant verbal approval and then complete the paperwork.

The Compliance Monitor will document the variance approval in the Daily Compliance Monitoring Report and transmit the approved form to the Compliance Manager for posting on the project website. If the variance exceeds the Compliance Monitor's authority level, the Compliance Monitor will inform the Lead Environmental Inspector that a Level 2 or Level 3 Variance request is required.

Level 2 Variance - A Level 2 Variance request exceeds the field decision authority of the Compliance Monitor and requires processing by the Compliance Manager. Before the Compliance Manager can approve a Level 2 Variance request, they will consult with FERC, the BLM and other authorized regulatory agency staff. Level 2 variance requests generally involve project changes that would affect an area outside of the previously approved work area, but

within the corridor previously surveyed for cultural resources and sensitive species. Level 2 Variance requests typically require the review of supplemental documents, correspondence and records. Some examples of a Level 2 Variance request include:

- using a workspace outside of the previously approved work area;
- modifying a previously approved access road in ways not previously identified;
- increasing the size of any previously approved temporary workspace or construction ROW width, where authority has not been previously granted and is needed. An example of this is to accommodate additional spoil generated from a road, railroad, or water body crossing for additional topsoil storage, side-slope construction, or where unstable (saturated) soils are present and landowner approval has been obtained;
- modifying seed mixes approved in agency documents due to unavailability;
- incorporating a minor route realignment where no new landowners will be affected and all work areas are within previously surveyed areas; and
- requesting entry into a Limited Operating Period Area before or after the allowed time.

To initiate a Level 2 Variance request, the Lead Environmental Inspector, Environmental Project Coordinator, or other designated Ruby representative will fill out a Variance Request Form and prepare the appropriate supporting documentation. The Environmental Project Coordinator or designated Ruby representative will then obtain the appropriate signatures, and complete and submit the Variance Request Form and supporting documentation by e-mail (scanned copy) or facsimile to the Compliance Manager. The Compliance Manager will review the request and supporting documentation and consult via telephone call or email with agencies' representatives (i.e. affected agency point of contact). The Compliance Manager may also discuss the request with the appropriate Compliance Monitor.

The Compliance Manager, Environmental Project Coordinator, and Project Manager, prior to construction activities (i.e. during environmental training for each spread), will meet with the affected field office and determine what situations warrant additional discussions with the field offices before Level 2 variances are approved.

If the Level 2 Variance request is approved, the Compliance Manager will sign the Variance Request Form and e-mail the approved form (scanned copy) to the designated company representatives, the Compliance Monitors, the FERC and BLM Project Managers, if necessary,

or other applicable federal and regulatory agency representatives. The variance may be implemented in the field as soon as the approved variance is received.

Level 3 Variance – A Level 3 Variance request generally involves project changes that would affect an area outside of the previously approved work area or have potential to impact cultural resources, sensitive species or other sensitive resources. Level 3 Variance requests must be formally filed with the FERC Secretary. All Level 3 Variance requests require a formal approval letter from the FERC Environmental Project Manager. Some examples of a Level 3 Variance include:

- requesting extra workspaces, access roads, route re-alignments, or facility relocations that affect new landowners or sensitive environmental areas or for which landowner approval cannot be obtained;
- requesting project-wide changes to mitigation measures or construction/restoration procedures;
- requesting extra workspaces, access roads, or route realignments outside of the previously surveyed corridor that require additional surveys and agency approvals that affect resources of sufficient sensitivity to require a Level 3 Variance approval as determined by the FERC Project Manager in consultation with the affected BLM field office, as needed; and
- modifying sites potentially eligible for the National Register of Historic Places or that involve state or federally protected species or their habitat.

In general, the designated Ruby representative will file the variance request, including appropriate supporting materials, with the FERC Secretary,. The FERC Project Manager will review the variance request and then issue a formal approval or denial letter. Once FERC approval is obtained, the variance may be implemented in the field as soon as the approved variance is received. The Compliance Manager will assist in the review of the request and will post the approval form on the project Web site. The Compliance Manager will consult with the affected agency point of contact on a case-by-case basis via telephone call or email. The Compliance Manger and Project Manager will meet with the affected field office and determine what situations warrant additional discussions with the field offices before Level 2 variances are approved.

To initiate a Level 3 Variance request, the Lead Environmental Inspector or other designated Ruby representative should first seek comments from the BLM Project Manager or other appropriate agency personnel before filing the variance request with FERC personnel. The federal agency representative should indicate a recommendation approval/disapproval of the variance request for review by the FERC Project Manager. Regarding cultural resources, the process outlined in the Memorandum of Agreement (s) for the project must be completed before FERC can approve the variance. If special status biological species and/or habitat are encountered during the additional surveys, documentation of consultation with applicable regulatory agencies must be provided with the variance request. Landowner approval must be documented, as appropriate.

Stop Work Procedures

As previously discussed, the Ruby's construction and management team, Lead Environmental Inspectors, Environmental Inspectors, FERC and BLM Project Managers have the authority to stop a construction activity that poses:

- a safety concern to people or harm to property;
- potential harm to threatened or endangered species or protected cultural or other resources;
- a violation of Project or permit specifications and requirements; or
- a violation of federal or state regulations.

A stop work order may also be issued to address repeated violations of non-compliance.

Before a stop work order is issued, steps will be taken to communicate and coordinate with all appropriate personnel. For Ruby's inspection team, the stop work order will not be issued until the Environmental Inspector has coordinated with the Lead Environmental Inspector, Environmental Project Coordinator, Construction Inspector, or Chief Construction Inspector. For the agency personnel, the stop work order will not be issued until the Compliance Monitor or Compliance Manager has coordinated with the FERC Project Manager and the BLM or other federal land agency Project Managers or designees; or state, county, or municipal regulatory agency representative(s) or designee(s), as applicable based on land jurisdiction.

After a stop work order has been issued, Ruby's Environmental Project Coordinator will notify all affected agency representatives and Ruby's Environmental Project Manager as well as

document the necessary corrective actions to resolve the issue of non-compliance and the timeframe for resolution.

Stop work orders will be documented in Daily and Weekly Compliance Monitoring Reports.

Project Website

[The Compliance Contractor] will establish and maintain a non-public, password-protected Project Web site to display the Daily Compliance Monitoring Reports; Weekly Compliance Monitoring Reports; and the approved Level 1, 2, and 3 Variance Request Forms. The Project Web site may also be used to post meeting minutes, notes from conference calls, and guidance from agencies regarding interpretation of environmental permitting and mitigation requirements. FERC and BLM Project Managers, other agency Project Managers and representatives with jurisdictional responsibilities, and the Compliance Manager and Compliance Monitors will have access to the entire Web site. Ruby's inspection team personnel will have access to portions of the web site as authorized by the FERC and BLM Project Managers.

Final Construction Compliance Report

Within 30 days prior to the scheduled close of Project construction, the Compliance Manager will coordinate a construction closeout meeting with representatives of Ruby, FERC, and the BLM to review and document that all agency compliance requirements have been met or will be met by the end of construction, identify areas of improvement, and ensure that all compliance issues have been satisfactorily resolved or will be close to resolution by the end of construction. All outstanding issues will include a detailed plan for closure by the end of construction.

The Compliance Manager will then coordinate Compliance Monitors to conduct construction compliance field inspections on each spread within 15 days of completing construction activities to assure that all work was finished in compliance with the FERC Certificate, the BLM ROW Grant, and any additional permitting and mitigation requirements that were agreed upon and documented during the course of Project construction.

Following this field inspection, the Compliance Manager will prepare a draft Construction Compliance Report. The draft Construction Compliance Report will be submitted to FERC and the BLM within 30 days of completion of the field inspections. The draft report will be circulated to FERC and the BLM for a 30-day review period. The Compliance Contractor will provide a

Final Construction Compliance Report to FERC and the BLM within 20 days of the end of the review period, in a format to be provided by FERC.

Post-Construction Inspections

Once construction of the Project is complete and Ruby's construction contractors have demobilized, [the Compliance Contractor] will participate in one or more post-construction inspections. The third-party monitoring contract shall remain open until all construction-related activities, including restoration and initial permanent seeding, are complete. This will ensure a continuous monitoring effort throughout the time Ruby is required to file its weekly status reports in accordance with environmental condition XX of the FERC Certificate. The Program will conclude at such time during restoration mutually agreeable to FERC, the BLM, and Ruby. The primary purpose of the post-construction inspections is to:

- evaluate the status of restoration and re-vegetation of the ROW;
- monitor the effectiveness of erosion controls; and
- document ROW areas that may need follow-up work.

The Compliance Manager or agreed-upon designee will participate in the post-construction inspections along with FERC and BLM Project Managers. The Compliance Manager will be responsible for preparing a Post-Construction Inspection Report for each post-construction inspection completed, including recommendations for the ongoing restoration, revegetation, and erosion control efforts.

Emergencies

Emergencies include incidents (fires etc.) and accidents (hazardous material or fuel truck spill etc.) requiring immediate action. They will be communicated immediately to the Lead Environmental Inspector and/or Environmental Project Coordinator. These personnel are in turn responsible for notifying construction managers, compliance monitors, appropriate federal agency staff (e.g. District Ranger on USFS lands) and landowners (if the emergency event occurs on private land). When an emergency occurs, personnel will act appropriately to preserve life, protect resources and remove immediate hazards in a manner that minimizes environmental impacts.

All emergency events will be documented in Daily and Weekly Monitoring and Inspection Reports. Whether the event is determined to result in non-compliance will depend on the situation and site conditions and whether Contractor negligence contributed.

Equipment

The Program will require field-support equipment such as notebook computers and associated software, digital cameras, cellular phones, and vehicles for field personnel, as described below. All equipment required by the environmental compliance monitoring team to fulfill the Program objectives will be furnished by the Compliance Contractor and will remain the property of the Compliance Contractor after completion of the Project.

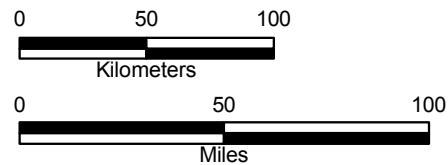
Members of the third-party compliance monitoring team will be equipped with a notebook computer and appropriate software to facilitate the compilation, transfer and storage of data. Each Compliance Monitor will also be equipped with a digital camera, cellular and satellite phones, global positioning system unit, and vehicle adapter. Each full-time Compliance Monitor throughout construction will utilize a four-wheel drive vehicle to maintain access to all areas of the ROW.

Ruby will be responsible for providing similar field equipment to its inspection team and for ensuring that this equipment is fully compatible with the field equipment provided by the Compliance Contractor.

Attachment A: Project Area



- | | | |
|-----------------------|-----------------|---------------------|
| ○ Mile Post (Approx.) | ★ City | --- County Boundary |
| — Proposed Route | — Major Highway | ▭ State Boundary |



Appendix A

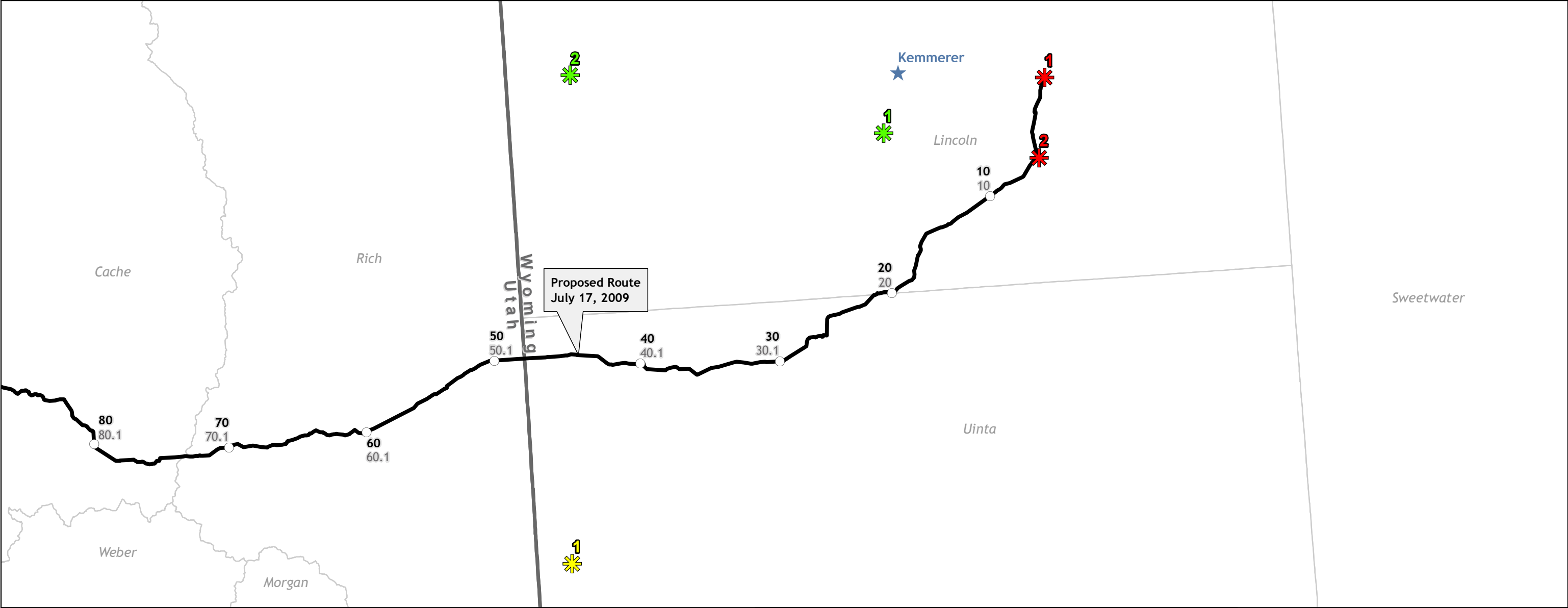
Proposed Route July 17, 2009

RUBY PIPELINE PROJECT

Attachment B: Aboveground Project Facilities

State	County	Milepost	Facility Type
Wyoming	Lincoln	0.0	Meter station (with 3 interconnects), MLV, launcher
	Lincoln	5.7	Roberson Creek Compressor Station, meter station (1 interconnect), MLV, launcher, receiver, communication tower
	Uinta	21.1	MLV
	Uinta	39.5	MLV
Utah	Rich	55.1	MLV
	Cache	73.3	MLV
	Cache	92.1	MLV
	Box Elder	R102.9	MLV, launcher, receiver
	Box Elder	109.0	MLV
	Box Elder	127.4	MLV
	Box Elder	144.5	MLV
	Box Elder	161.1	MLV
	Box Elder	172.5	Wildcat Hills Compressor Station, MLV, launcher, receiver, communication tower
	Box Elder	190.6	MLV
	Box Elder	206.1	MLV
	Box Elder	222.3	MLV
Nevada	Elko	239.1	MLV
	Elko	257.4	MLV, launcher, receiver
	Elko	275.9	MLV
	Elko	R292.7	MLV
	Elko	311.1	MLV
	Elko	330.2	Wieland Flat Compressor Station, MLV, launcher, receiver, communication tower
	Elko	345.7	MLV
	Elko	R364.2	MLV
	Elko	R382.8	MLV
	Humboldt	R401.8	MLV, launcher, receiver
	Humboldt	421.1	MLV
	Humboldt	437.4	Meter station (1 interconnect), MLV
	Humboldt	456.9	MLV
	Humboldt	476.4	Desert Valley Compressor Station, MLV, launcher, receiver, communication tower
	Humboldt	493.2	MLV
	Humboldt	509.8	MLV
	Humboldt	528.8	MLV, launcher, receiver
	Washoe	547.8	MLV
	Washoe	567.2	MLV
	Washoe	582.0	MLV, launcher, receiver
Oregon	Lake	601.1	MLV
	Lake	614.3	MLV
	Lake	627.8	MLV
	Lake	643.1	MLV
	Klamath	R659.2	MLV
	Klamath	R672.7, 2.6	Meter station (3 interconnects), 2 MLVs, receiver
	Klamath	0.0	MLV

LABEL	NAME	LABEL	NAME	LABEL	NAME	LABEL	NAME
1	King Compressor Station	1	Evanston Contractor Construction Yard	1	Glenco Jct Pipe Storage Staging Yard	8	Sod House Pipe Storage Staging Yard
2	Roberson Creek Compressor Station	2	Hyrum Contractor Construction Yard	2	Sage Jct Pipe Storage Staging Yard	9	Leonard Creek Pipe Storage Staging Yard
3	Wildcat Hills Compressor Station	3	Wells Contractor construction Yard	3	Penrose Pipe Storage Staging Yard	10	Suprise Valley Pipe Storage Staging Yard
4	Wieland Flat Compressor Station	4	Bear River Contractor Construction Yard	4	Highway 93 Pipe Storage Staging Yard	11	Lakeview 2 Pipe Storage Staging Yard
5	Desert Valley Compressor Station	5	Elko Contractor Construction Yard	5	Maggie Creek Pipe Storage Staging Yard	12	Merrill 2 Pipe Storage Staging Yard
1	Vya Construction Camp/Staging Yard	6	Winnemucca Contractor Construction Yard	6	Carlin Pipe Storage Staging Yard		
		7	Highway 95 Contractor Construction Yard	7	Midas Road Pipe Storage Staging Yard	13	Langell Valley Gravel Pit
		8	Lakeview Contractor Construction Yard				



Environmental Milepost

Alignment Sheet Milepost

Proposed Route

Compressor Station

Construction Camp/Staging Yard

Contractor Construction Yard

Pipe Storage Staging Yard

State Boundary

County Boundary

City

0

10

20

Kilometers

0

10

20

Miles

N

0

10

20

0

10

20

Kilometers

0

10

20

Miles

Appendix B (1 of 4)

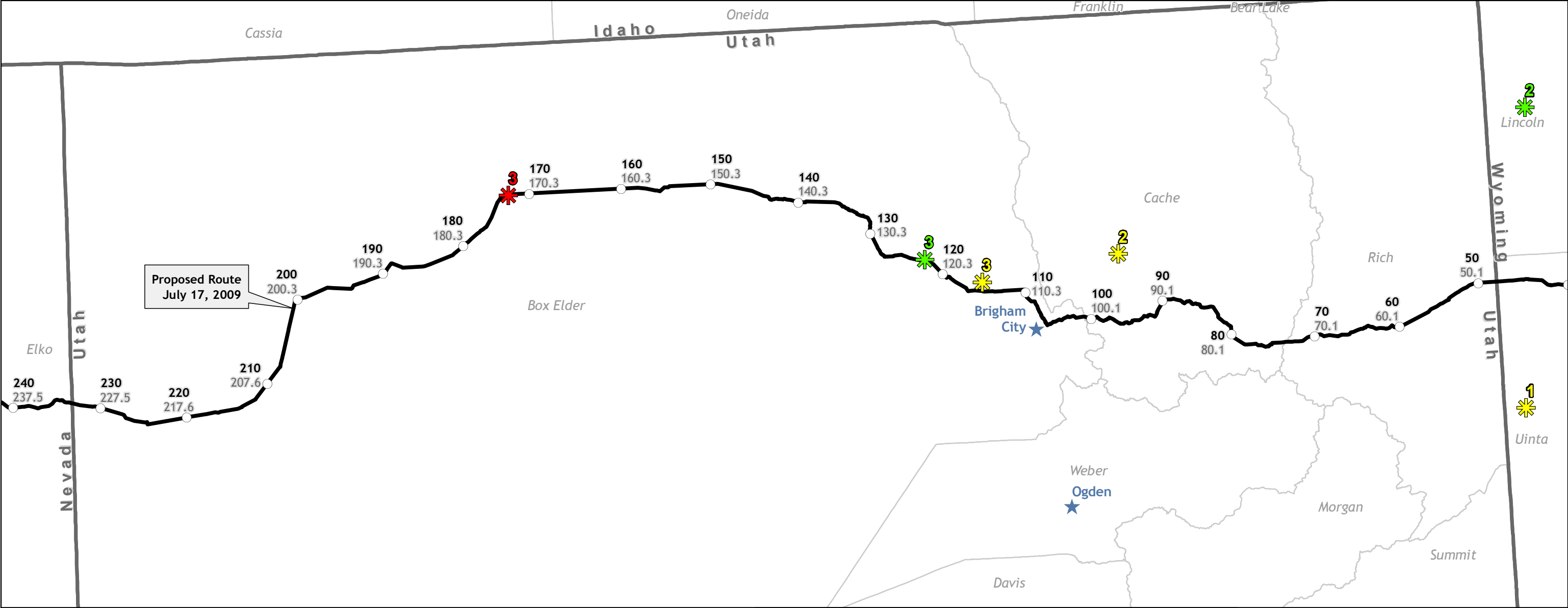
Above Ground Project Facilities

Proposed Route (July 17, 2009)

WYOMING

RUBY PIPELINE PROJECT

LABEL	NAME	LABEL	NAME	LABEL	NAME	LABEL	NAME
1	King Compressor Station	1	Evanston Contractor Construction Yard	1	Glenco Jct Pipe Storage Staging Yard	8	Sod House Pipe Storage Staging Yard
2	Roberson Creek Compressor Station	2	Hyrum Contractor Construction Yard	2	Sage Jct Pipe Storage Staging Yard	9	Leonard Creek Pipe Storage Staging Yard
3	Wildcat Hills Compressor Station	3	Wells Contractor construction Yard	3	Penrose Pipe Storage Staging Yard	10	Suprise Valley Pipe Storage Staging Yard
4	Wieland Flat Compressor Station	4	Bear River Contractor Construction Yard	4	Highway 93 Pipe Storage Staging Yard	11	Lakeview 2 Pipe Storage Staging Yard
5	Desert Valley Compressor Station	5	Elko Contractor Construction Yard	5	Maggie Creek Pipe Storage Staging Yard	12	Merrill 2 Pipe Storage Staging Yard
1	Vya Construction Camp/Staging Yard	6	Winnemucca Contractor Construction Yard	6	Carlin Pipe Storage Staging Yard		
		7	Highway 95 Contractor Construction Yard	7	Midas Road Pipe Storage Staging Yard	13	Langell Valley Gravel Pit
		8	Lakeview Contractor Construction Yard				



○

Environmental Milepost

Alignment Sheet Milepost

—

Proposed Route

✱

Compressor Station

✱

Construction Camp/Staging Yard

✱

Contractor Construction Yard

✱

Pipe Storage Staging Yard

▭

State Boundary

▭

County Boundary

★

City

0

10

20

30

010203040

Kilometers

0

10

20

30

40

010203040

Miles

Appendix B (2 of 4)

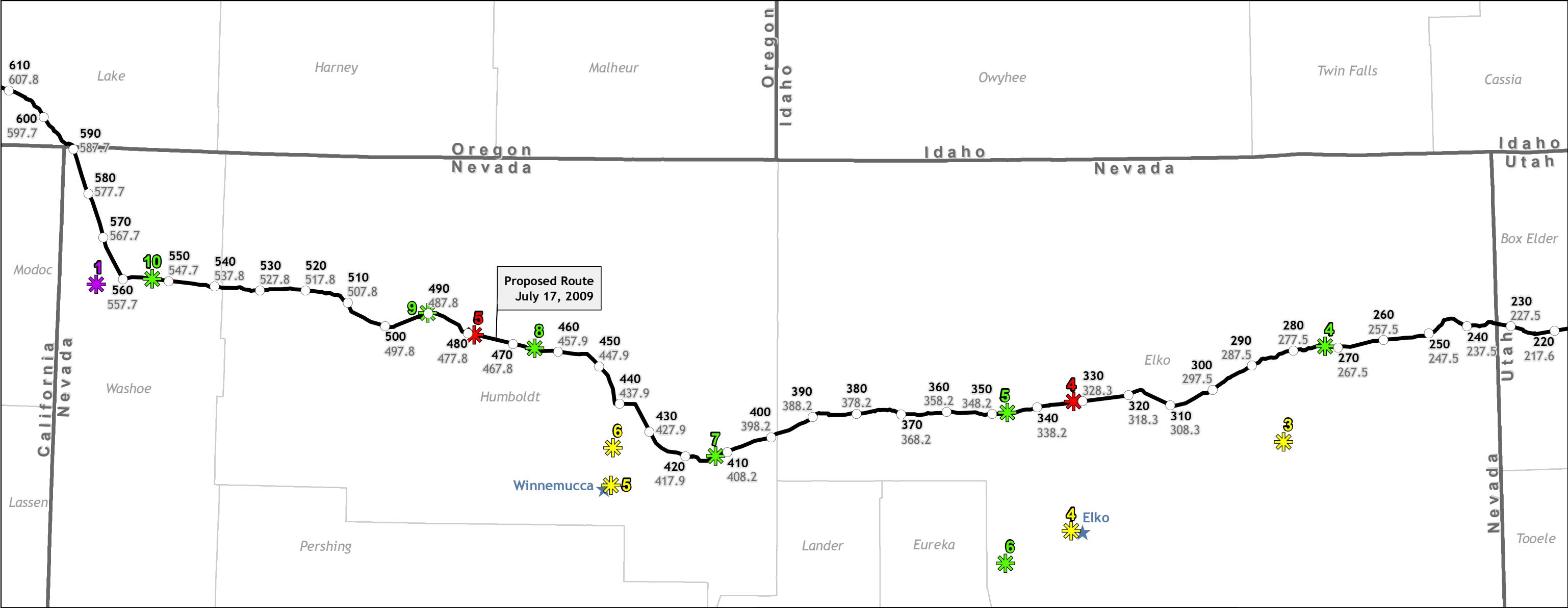
Above Ground Project Facilities

Proposed Route (July 17, 2009)

UTAH

RUBY PIPELINE PROJECT

LABEL	NAME	LABEL	NAME	LABEL	NAME	LABEL	NAME
1	King Compressor Station	1	Evanston Contractor Construction Yard	1	Glenco Jct Pipe Storage Staging Yard	8	Sod House Pipe Storage Staging Yard
2	Roberson Creek Compressor Station	2	Hyrum Contractor Construction Yard	2	Sage Jct Pipe Storage Staging Yard	9	Leonard Creek Pipe Storage Staging Yard
3	Wildcat Hills Compressor Station	3	Wells Contractor construction Yard	3	Penrose Pipe Storage Staging Yard	10	Suprise Valley Pipe Storage Staging Yard
4	Wieland Flat Compressor Station	4	Bear River Contractor Construction Yard	4	Highway 93 Pipe Storage Staging Yard	11	Lakeview 2 Pipe Storage Staging Yard
5	Desert Valley Compressor Station	5	Elko Contractor Construction Yard	5	Maggie Creek Pipe Storage Staging Yard	12	Merrill 2 Pipe Storage Staging Yard
1	Vya Construction Camp/Staging Yard	6	Winnemucca Contractor Construction Yard	6	Carlin Pipe Storage Staging Yard		
		7	Highway 95 Contractor Construction Yard	7	Midas Road Pipe Storage Staging Yard	13	Langell Valley Gravel Pit
		8	Lakeview Contractor Construction Yard				



Environmental Milepost

Alignment Sheet Milepost

Proposed Route

Compressor Station

Construction Camp/Staging Yard

Contractor Construction Yard

Pipe Storage Staging Yard

State Boundary

County Boundary

City

0

10

20

30

40

50

60

Kilometers

0

10

20

30

40

50

60

Miles

N

Appendix B (3 of 4)

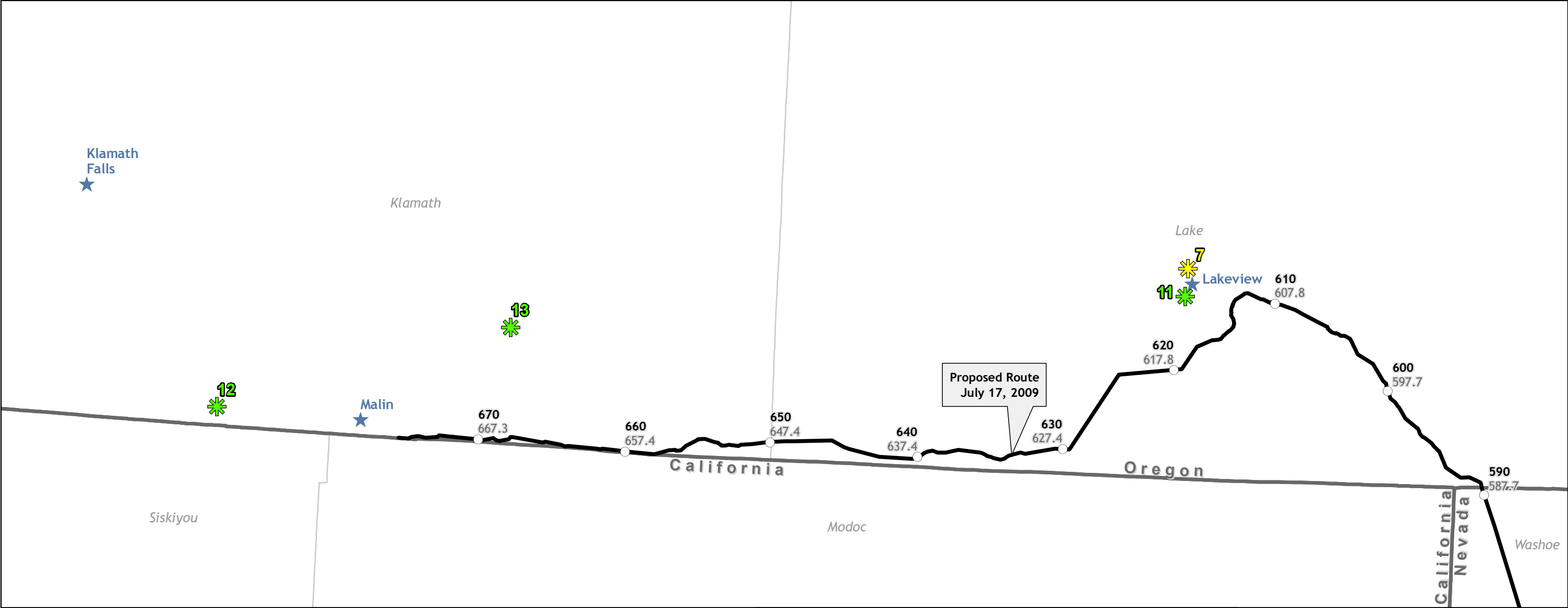
Above Ground Project Facilities

Proposed Route (July 17, 2009)

NEVADA

RUBY PIPELINE PROJECT

LABEL	NAME	LABEL	NAME	LABEL	NAME	LABEL	NAME
1	King Compressor Station	1	Evanston Contractor Construction Yard	1	Glenco Jct Pipe Storage Staging Yard	8	Sod House Pipe Storage Staging Yard
2	Roberson Creek Compressor Station	2	Hyrum Contractor Construction Yard	2	Sage Jct Pipe Storage Staging Yard	9	Leonard Creek Pipe Storage Staging Yard
3	Wildcat Hills Compressor Station	3	Wells Contractor construction Yard	3	Penrose Pipe Storage Staging Yard	10	Suprise Valley Pipe Storage Staging Yard
4	Wieland Flat Compressor Station	4	Bear River Contractor Construction Yard	4	Highway 93 Pipe Storage Staging Yard	11	Lakeview 2 Pipe Storage Staging Yard
5	Desert Valley Compressor Station	5	Elko Contractor Construction Yard	5	Maggie Creek Pipe Storage Staging Yard	12	Merrill 2 Pipe Storage Staging Yard
1	Vya Construction Camp/Staging Yard	6	Winnemucca Contractor Construction Yard	6	Carlin Pipe Storage Staging Yard		
		7	Highway 95 Contractor Construction Yard	7	Midas Road Pipe Storage Staging Yard	13	Langell Valley Gravel Pit
		8	Lakeview Contractor Construction Yard				



Environmental Milepost

Alignment Sheet Milepost

Proposed Route

Compressor Station

Construction Camp/Staging Yard

Contractor Construction Yard

Pipe Storage Staging Yard

State Boundary

County Boundary

City

N

0

10

20

Kilometers

0

10

20

Miles

Appendix B (4 of 4)

Above Ground Project Facilities

Proposed Route (July 17, 2009)

OREGON

RUBY PIPELINE PROJECT

Attachment C: Compliance Checklist

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
FEIS			
Section 5.2			
	<p>Ruby shall follow the construction procedures and mitigation measures described in its application, supplemental filings (including responses to staff data requests), and as identified in the EIS, unless modified by the Commission's Order. Ruby must:</p> <ol style="list-style-type: none"> request any modification to these procedures, measures, or conditions in a filing; justify each modification relative to site-specific conditions; explain how that modification provides an equal or greater level of environmental protection than the original measure; and receive approval in writing from the Director of OEP before using that modification. 		
1			
	<p>The Director of OEP has delegated authority to take whatever steps are necessary to ensure the protection of all environmental resources during construction and operation of the project. This authority shall allow:</p> <ol style="list-style-type: none"> the modification of conditions of the Commission's Order; and the design and implementation of any additional measures deemed necessary (including stop work authority) to assure continued compliance with the intent of the environmental conditions as well as the avoidance or mitigation of adverse environmental impact resulting from project construction and operation 		
2			
	<p>Prior to any construction, Ruby shall file an affirmative statement, certified by a senior company official, that all company personnel, EIs, and contractor personnel will be informed of the EI's authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs</p>		
3	before becoming involved with construction and restoration activities.		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
4	<p>The authorized facility locations shall be as shown in the EIS, as supplemented by filed alignment sheets. As soon as they are available, and before the start of construction, Ruby shall file any revised detailed survey alignment map/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Commission's Order. All requests for modifications of 5-16 environmental conditions of the Commission's Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.</p> <p>Ruby's exercise of eminent domain authority granted under Section 7(h) of the NGA in any condemnation proceedings related to the Commission's Order must be consistent with these authorized facilities and locations. Ruby's right of eminent domain granted under Section 7(h) of the NGA does not authorize Ruby to increase the size of its natural gas pipeline to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.</p>		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
	<p>Ruby shall file detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000 identifying all route realignments or facility relocations, and staging areas, pipe storage yards, new access roads, and other areas that would be used or disturbed and have not been previously identified in previous filings. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/sheets/aerial photographs. Each area must be approved in writing by the Director of OEP before construction in or near that area.</p> <p>This requirement does not apply to route variations recommended herein, extra workspace allowed by Ruby's Plan, or minor field realignments per landowner needs and requirements that do not affect other landowners or sensitive environmental area</p> <ul style="list-style-type: none"> a. implementation of cultural resources mitigation measures; b. implementation of endangered, threatened, or special concern species mitigation n c. recommendations by state regulatory authorities; and d. agreements with individual landowners that affect other landowners or could affect 		
	5		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
	<p>Within 60 days of the acceptance of the Certificate and before construction begins, Ruby shall file an Implementation Plan for the review and written approval of the Director of OEP. Ruby must file revisions to the plan as schedules change. The plan shall identify:</p> <ul style="list-style-type: none"> a. how Ruby will implement the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests), identified in the EIS, and required by the Order; b. how Ruby will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel; c. the number of EIs assigned per spread and aboveground facility site, and how Ruby will ensure that sufficient personnel are available to implement the environmental mitigation; d. company personnel, including EIs and contractors, who will receive copies of the appropriate materials; e. the location of the environmental compliance training Ruby will give to all personnel involved with construction and restoration (initial and refresher training as the project f. the company personnel (if known) and specific portion of Ruby's organization having g. the procedures (including use of contract penalties) Ruby will follow if noncompliance h. for each discrete facility, a Gantt or PERT chart (or similar project scheduling diagram) i. the completion of all required surveys and reports; ii. the environmental compliance training of onsite personnel; iii. the start of construction; and iv. the start and completion of restoration. 		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
7	<p>Ruby shall employ a team of two or more EIs, or as may be established by the Director of OEP, per construction spread. The EIs shall be:</p> <ul style="list-style-type: none"> a. responsible for monitoring and ensuring compliance with all mitigation measures required by the Order and other grants, permits, certificates, or other authorizing documents; b. responsible for evaluating the construction contractor's implementation of the environmental mitigation measures required in the contract (see condition 6 above) and any other authorizing document; c. empowered to order correction of acts that violate the environmental conditions of the Order, and any other authorizing document; d. a full-time position, separate from all other activity inspectors; e. responsible for documenting compliance with the environmental conditions of the Order, as well as any environmental conditions/permit requirements imposed by other federal, state, or local agencies; and f. responsible for maintaining status reports. 		
8	<p>Beginning with the filing of its Implementation Plan, Ruby shall file updated status reports on a weekly basis until all construction and restoration activities are complete. On request, these status reports will also be provided to other federal and state agencies with permitting responsibilities. Status reports shall include:</p> <ul style="list-style-type: none"> a. an update on Ruby's efforts to obtain the necessary federal authorizations; b. the construction status of each spread, work planned for the following reporting period, and any schedule changes for stream crossings or work in other environmentally sensitive areas; c. a listing of all problems encountered and each instance of noncompliance observed by the EIs during the reporting period (both for the conditions imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies); d. a description of the corrective actions implemented in response to all instances of noncompliance, and their cost; e. the effectiveness of all corrective actions implemented; f. a description of any landowner/resident complaints that may relate to compliance with the Order; g. copies of any correspondence received by Ruby from other federal, state, or local agencies. 		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
9	Prior to receiving written authorization from the Director of OEP to commence construction of any project facilities, Ruby shall file with the Secretary documentation that it has received all authorizations required under federal law (or evidence of waiver thereof).		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
	<p>Ruby shall develop and implement an environmental complaint resolution procedure that remains active for at least 3 years following the completion of project construction. The procedure shall provide landowners with clear and simple directions for identifying and resolving their environmental mitigation problems/concerns during construction of the project and restoration of the right-of-way. Prior to construction, Ruby shall mail the environmental complaint resolution procedure to each landowner whose property would be crossed by the project.</p> <p>a. In the letter to affected landowners, Ruby shall:</p> <p>(1) provide a local contact that the landowners should call first with their concerns; the letter shall indicate how soon to expect a response;</p> <p>(2) instruct the landowners that, if they are not satisfied with the response, they should call Ruby's Hotline; the letter shall indicate how soon to expect a response; and</p> <p>(3) instruct the landowners that, if they are still not satisfied with the response from Ruby's Hotline, they should contact the Commission's Enforcement Hotline at (888) 889-8030.</p> <p>b. In addition, Ruby shall include in its weekly status report a table that contains the following:</p> <p>(1) the identity of the caller and the date of the call;</p> <p>(2) the identification number from the certificated alignment sheet(s) of the affected project;</p> <p>(3) a description of the problem/concern; and</p> <p>(4) an explanation of how and when the problem was resolved, will be resolved, or why it was not resolved.</p>		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
11	Ruby must receive written authorization from the Director of OEP before placing the project into service . Such authorization will only be granted following a determination that rehabilitation and restoration of the right-of-way and other areas of project-related disturbance are proceeding satisfactorily.		
12	Within 30 days of placing the certificated facilities in service, Ruby shall file an affirmative statement, certified by a senior company official: a. that the facilities have been constructed in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or b. identifying the Certificate conditions with which Ruby has complied or will comply. The statement shall also identify any areas affected by the project where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.		
13	Ruby shall restrict the use of temporary extra workspaces to those locations identified as "Conditionally Approved for Use" in table E-1, Appendix E of this EIS. (section 4.1.1)		
14	Prior to construction, Ruby shall file the results of its preconstruction geological investigation to evaluate if abandoned mines are present in the project area. If abandoned mines are present, Ruby shall file a plan to address abandoned mine hazards and file documentation of consultation with the BLM and appropriate state geologists in the development of these plans for the review and written approval by the Director of OEP. (section 4.1.2.1)		
15	Prior to construction from MPs 519.0 to 524.0 and MPs 631.5 to 633.0, Ruby shall file the results of its preconstruction surveys for mercury-containing rock along these segments, including results of any soil samples collected and analyzed as part of the preconstruction surveys. (section 4.1.2.1)		
16	Prior to construction from MP 613.4 to 614.6, Ruby shall file the results of its preconstruction survey of this direct use geothermal area. If Ruby identifies geothermal wells or springs in the geothermal area, Ruby shall consult with the Oregon Department of Geology and Mineral Industries to develop appropriate measures to mitigate impacts on these resources and file documentation of consultation and any mitigation plans for review and written approval by the Director of OEP. (section 4.1.2.3)		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
17	If Ruby identifies karst/pseudokarst features during construction, it shall clearly mark the area of the feature and shall handle and store all fuels, solvents, and lubricants; perform all concrete coating activities; and stage and store all equipment at least 100 feet from the feature. Ruby shall inform the appropriate state natural heritage agency if a feature is opened during construction. In addition, Ruby shall include the identification of these features in its weekly construction status report. (section 4.1.3.3)		
18	Ruby shall implement the USGS's specified soil segregation technique for cryptobiotic soil crusts in the areas of MPs 170.0, 487.9, and 594.0. (section 4.2.2.2)		
19	Ruby shall relocate the temporary extra workspaces and a pipe storage yard at MP 487.9 to avoid the underlying playa and file the revised workspace and yard locations for review and written approval of the Director of OEP. Where temporary work areas abut a playa, Ruby shall install exclusion fencing and warning signs around the playa to prevent project disturbance. (section 4.2.2.3)		
20	Ruby shall revise its Plan to prohibit expanding the construction right-of-way width for temporary storage of timber, slash, stumps, surface rock, or snow in wetlands, playas, and forested areas. Ruby shall file its revised Plan prior to construction . (section 4.2.4)		
21	Ruby shall conduct its proposed post-construction well testing within 30 days of the completion of construction in the area of each water well presented in table 4.3.1-1 of final EIS. If testing indicates diminished yield, water quality, and/or usability, Ruby shall provide a temporary source of water or provide other remedies as agreed to by the landowner. (section 4.3.1.3)		
22	Prior to construction, Ruby shall test all springs presented in table 4.3.1-2 of this EIS. Testing shall be conducted using a certified water testing laboratory and shall include analysis of yield; contaminants associated with fuels, lubricants, oils, <i>etc.</i> ; and standard drinking water parameters. These same springs shall be tested again within 30 days of the completion of construction in the area of the spring. If testing indicates diminished yield, water quality, and/or usability of the spring for its permitted or intended purposes, Ruby shall provide a temporary source of water or provide other remedies as agreed to by the landowner. (section 4.3.1.3)		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
23	Prior to construction, Ruby shall file plans developed in consultation with the appropriate state agencies to protect wellhead protection areas. (section 4.3.1.3)		
24	Ruby shall revise section IV.A.1 of its Procedures, and its Spill Plan, to prohibit handling or storage of fuels, solvents, or lubricants; performing concrete coating activities; or staging or storing equipment within 200 feet of any water supply well or spring. (section 4.3.1.4)		
25	Ruby shall locate all temporary extra workspaces and staging areas at least 50 feet from waterbodies and limit the construction right-of-way to 115 feet wide in waterbodies. (section 4.3.2.4)		
26	Ruby shall discharge all hydrostatic test water to a temporary sediment filtration and energy dissipation structure. (section 4.3.2.5)		
27	Ruby shall file site-specific justification that identifies where access road improvements in wetlands are proposed to occur. Ruby shall include an explanation as to why each wetland cannot be avoided and a description of the construction and restoration measures that would be implemented to minimize wetland impacts. Ruby shall not begin access road improvements in wetlands until it has received written authorization from the Director of OEP. (section 4.3.3.1)		
28	Ruby shall locate all temporary extra workspaces and staging areas at least 50 feet from wetlands and limit the construction right-of-way to 75 feet wide in wetlands. (section 4.3.3.2)		
29	Prior to construction, Ruby shall file its Wetland Restoration Plan. This plan shall be developed in consultation with the COE and appropriate state and land managing agencies. This plan shall include measures for seeding and replanting wetland vegetation affected by all project activities and shall identify measures for ensuring wetland revegetation would be successful. (section 4.3.3.3)		
30	Ruby shall limit its construction right-of-way width to 75 feet in the woody riparian habitats identified in table 4.4.3-1 of the EIS. For any location where Ruby believes temporary extra workspaces/staging areas are necessary in woody riparian habitat, Ruby shall provide site-specific justification written approval from the Director of OEP prior to using the temporary extra workspace or staging area. (section 4.4.3)		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
31	Ruby shall plant woody riparian vegetation (e.g. , shrubs, cuttings, seedlings, saplings) in all woody riparian areas (except directly over the trenchline) as soon as possible after construction within the appropriate planting season, including the riparian areas impacted by access roads. Ruby shall consult with the landowner or appropriate land managing agency to identify the species and planting densities to be used and any methods to protect planted riparian areas from grazing and browsing impacts, such as browse protection or fencing, until these areas become established. Ruby shall monitor the success of riparian habitat restoration for 5 years after construction. At the end of the 5-year period , Ruby shall file a report identifying the status of the woody riparian restoration and the need for any additional restoration efforts. (section 4.4.3)		
32	Ruby shall incorporate into its project design the FWS's <i>Guidance on the Siting, Construction, Operation and Decommissioning of Communications Towers</i> . (section 4.5.1.1)		
33	Ruby will coordinate with the FWS, NDOW, and ODFW to determine if and how fish deterrence practices shall be implemented before blasting takes place in any waterbody that has the potential to contain special status fish species as identified in section 4.7 of this EIS. Ruby shall file the 5-21 results of its consultations with these agencies prior to crossing the affected waterbody . (section 4.6.1.7)		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
34	<p>Ruby shall implement an equipment disinfection plan to incorporate one or more of the following measures during construction as equipment enters and exits each of the 25 HUC watersheds crossed by the project, as equipment exits the Little Bear River, and as equipment exits waterbodies known to contain pathogens and nonnative aquatic species that can be spread by contact with construction equipment. Ruby shall remove mud and debris from equipment and either:</p> <ul style="list-style-type: none"> a. keep the equipment dry for at least 10 days prior to use; b. spray or soak the equipment with 1) a 10-percent chlorine bleach solution, 2) a 1:1 solution of Formula 409 household cleaner, or 3) a 1:15 solution of Sparquat 256 institutional cleaner, making sure to keep the equipment moist with the cleaner for at least 10 minutes; or c. spray or soak the equipment with steam or water greater than 130 °F for at least 10 minutes. <p>Additionally, if Ruby identifies any invasive water organism on any equipment as it leaves a waterbody or wetland, Ruby shall report the sighting to the appropriate state conservation office and implement disinfection measures on all equipment as it leave</p>		
35	<p>Ruby shall revise the site-specific waterbody crossing plans for Twelvemile Creek, Twentymile Creek, Thomas Creek, and Lost River. These plans shall include the proposed crossing method, seasonal timing restrictions, Ruby's proposed construction procedures, and any other measures that would minimize impacts on the Lost River sucker, Modoc sucker, shortnose sucker, and Warner sucker. In addition, Ruby shall file the results of any consultation with the FWS, Reclamation, and ODFW regarding the crossing method and conservation measures for the Lost River. Ruby shall not begin any construction activities in these waterbodies until:</p> <ul style="list-style-type: none"> a. FERC staff receives the requested information, as well as any comments from the FWS, Reclamation, and ODFW; b. staff completes any necessary Section 7 consultation with the FWS; and c. Ruby has received written notification from the Director of OEP that construction or use of mitigation may begin. (section 4.7.2.4) 		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
36	Ruby shall not start construction in any area where Ute ladies'-tresses are identified during preconstruction surveys until: a. FERC staff receives the survey report for the Ute ladies'-tresses sighting, as well as any comments from the FWS regarding project impacts on this species; b. staff completes any necessary Section 7 consultation with the FWS; and c. Ruby has received written notification from the Director of OEP that construction or use of mitigation may begin. (section 4.7.2.6)		
37	Ruby shall control the outflow of hydrostatic test water discharge structures to ensure that discharge water does not reach occupied pygmy rabbit burrows at MPs 6, 41.4 to 41.6, 56.5 to 59, 260.9 to 261, and 275.8. (section 4.7.3.3)		
38	Ruby shall modify the right-of-way configuration (e.g., use the opposite side of the right-of-way to operate vehicle traffic) or reduce the construction right-of-way width to 75 feet where crossing known colonies to avoid white-tailed prairie dog burrows to the greatest extent possible. In addition, where a colony only occurs along the edge of the construction right-of-way, the colony edge shall be flagged or exclusion fencing be erected to avoid impacts on burrows. (section 4.7.3.4)		
39	Ruby shall file with its quarterly reports (as specified in Ruby's Plan, section VII.B.2) details discussing whether any complaints were received concerning the restoration of the precisionleveled fields crossed by the project and how each was resolved. (section 4.8.1.3)		
40	Ruby shall continue to work with UDWR and FWS to ensure all project impacts on the East Fork and Salt Creek WMAs' resources are fully addressed via development of a WMA Impact Management and Mitigation Plan. (section 4.8.2.2)		
41	Ruby shall provide its Northwestern Nevada Sensitive Area Contractor Education training to all of its contractor personnel working between MPs 490 and 580. (section 4.8.3.6)		
42	Ruby shall coordinate with all jurisdictional fire response authorities affected by the project to revise its Fire Prevention and Suppression Plan to meet the standards of those authorities. The revised plan, along with any agency comments on the plan, shall be filed for review and written approval of the Director of OEP prior to construction. (section 4.9.3)		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
	<p>Ruby shall work with local governmental agencies in Elko, Winnemucca, in the area of the Vya Construction Camp, and where conflicts with mining traffic may occur to identify all areas where traffic could be disrupted by construction or construction-related traffic and define specific traffic control plans for each of these locations. These plans shall include (at a minimum) a commitment to provide, as necessary:</p> <ul style="list-style-type: none"> a. signage to identify approaching construction or access points; b. daily review and cleanup of sediment deposits and pavement damage on roadways; and c. traffic control personnel in areas of lane closures or heavy traffic. <p>The traffic control plans shall be filed for review and written approval of the Director of OEP prior to construction. (section 4.9.4)</p>		
43			
44	to be added		
45	to be added		
POD			
POD Main Body			
Appendix B: Waste and Spill Management Specifications			
Appendix C: Hydrostatic Test Plan			
Section 1.1, Page 1-1; Attachment A	WGFD, UDWR, NDOW, ODFW all require surface water be discharged within the same HUC-8 watershed from which it was withdrawn. In addition, WGFD and UDWR require surface water withdrawals to remain within the respective state from which it was withdrawn.		
Section 1.1, Page 1-1; Attachment D	Both WGFD and NDOW recommend the use of temporary sediment basins in any areas where: the water discharge point is less than 0.5 mile from a perennial stream; and where the water discharge point is more than 0.5 mile from a perennial stream, but the discharge flow is greater than 0.5 cfs. In addition, UDEQ requires that velocity dissipation devices are placed at point source discharge locations.		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
Section 1.1, Page 1-2	ODFW requires that surface water intakes be screened per ODFW guidelines, and the Project design should ensure that adequately sized screens and approach velocities are included in the water withdrawal plans.		
Section 1.1, Page 1-2	During all proposed surface water withdrawals and waterbody construction activities, Ruby would comply with ODFW fish passage statutes (Oregon Administrative Rule [OAR] 635-412-2.0005). Ruby would maintain adequate fish passage at all Project crossings to provide passage of native migratory fish (OAR 509.610). Ruby would provide fish passage design plans for all intermittent and perennial streams crossed in Oregon. If necessary, Ruby would apply for a fish passage waiver (OAR 635-412-0025) during in-water construction activities in waterbodies that contain sensitive fish species.		
Section 1.1, Page 1-2	If water used for construction or hydrostatic testing is not obtained from municipal supplies or other water wells, Ruby would comply with OAR Water Use Authorization 690-340-0030.		
Section 2.1, Page 2-3	Withdrawal for dust abatement will likely begin upon FERC's and U.S. Bureau of Land Managements (BLM's) notice to proceed.		
Section 3.0, Page 3-1	Any fish impinged on the intake screen will be reported to the U.S. Fish and Wildlife Service (USFWS) at (801) 975-3330 and the appropriate state agency.		
Section 4.3, Page 4-3	The WDEQ authorizes hydrostatic testing of pipes under the General Permit to Discharge Wastewater for: Notice of Intent for Temporary Discharges. The Notice of Intent (NOI) should be submitted at least 30 days in advance of any anticipated discharge.		
Section 4.3, Page 4-6	Hydrostatic Testing is covered under UDWQ Authorization to Discharge Under the Utah Pollution Discharge Elimination System, General Permit for Construction Dewatering and Hydrostatic Testing. Authorization to discharge is granted after submittal of a completed NOI and after signature of the Executive Secretary authorizing coverage between an effective date and an expiration date.		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
Section 4.3, Page 4-7	The NBWP Control issues Nevada NPDES permits. Hydrostatic Testing is covered as a "Temporary Permit" under the NPDES General Permit for Stormwater Discharges Associated with Construction Activity and is valid for a maximum of 180 days. Monitoring requirements are developed by NBWP for each permit application. All analyses must be completed by a Nevada State Certified Lab.		
Section 4.3, Page 4-7	Because water from hydrostatic testing will be discharged to upland areas (not waterbodies), ODEQ will be covering hydrostatic test water discharge under a Water Pollution Control Facility (WPCF) general permit.		
Section 1.1, Page 1-2	To confirm the presence or absence of NAS, E & E contacted state fish and wildlife agency representatives familiar with water bodies along the route of the pipeline		
Section Oregon, Page C-11	ODFW indicated that Ruby would be required to survey waterbodies where there is no existing NAS information		
Appendix D: Ruby's Plan	detail to be added		
Appendix E: Oregon Restoration Plan	detail to be added		
Appendix E: Utah Restoration Plan	detail to be added		
Appendix E: Nevada Restoration Plan	detail to be added		
Appendix E: Wyoming	detail to be added		
Appendix F: Ruby's Procedures	detail to be added		
Appendix H: Noxious Weed Plan	detail to be added		
Appendix I: Biological Resources	detail to be added		
Appendix K: Paleo Plan	detail to be added		
Appendix N: Fugitive Dust Plan	detail to be added		
Appendix O: Sheldon Transportation Plan	detail to be added		
Appendix O: Traffic Plan	detail to be added		
Appendix Q: Wetland Mitigation Plan	detail to be added		
Appendix R: Groundwater Monitoring Plan	detail to be added		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
Final FERC Order			
BLM ROW Grant			
Permit Requirements			
Federal			
Federal Communications Commission: License for Operating Fixed Microwave Communications Facilities- Not on Critical path			
United States Fish & Wildlife Service - Sheldon National Wildlife Refuge	Special Use Permit - Access Roads		
Army Corps of Engineers	Nationwide Permit No. 12 Section 404- Jurisdictional Determination		
	Nationwide Permit No. 12 Section 404- Preconstruction Notification		
	Section 401 Permits Conditionally Certified with 404		
Federal Aviation Administration	FAA 7460-1 Permit		
United States Bureau of Reclamation, MP Region	Right of use Application - Lost River		
	Use Application for Survey		
State			
Wyoming Department of environmental Quality, Water Quality Devision	Small Wastewater Facility (septic tank) Permit		
	Stormwater Discharge Permit		
Wyoming Department of Environmental Quality, Air Quality Devision	Wavier for Back-up Generator		
Wyoming Department of Transportation - Maintenance	WYDOT Utility License		
Utah Department of Environmental Quality, Division of Water Quality	Storm Water General Permit for construction activities		
	Permit by Rule for Hydrostatic Discharge and Construction Dewatering		
Utah Department of Environmental Quality, Division of Air Quality	Air Permit/Approval Order		

Appendix C Ruby Compliance Checklist

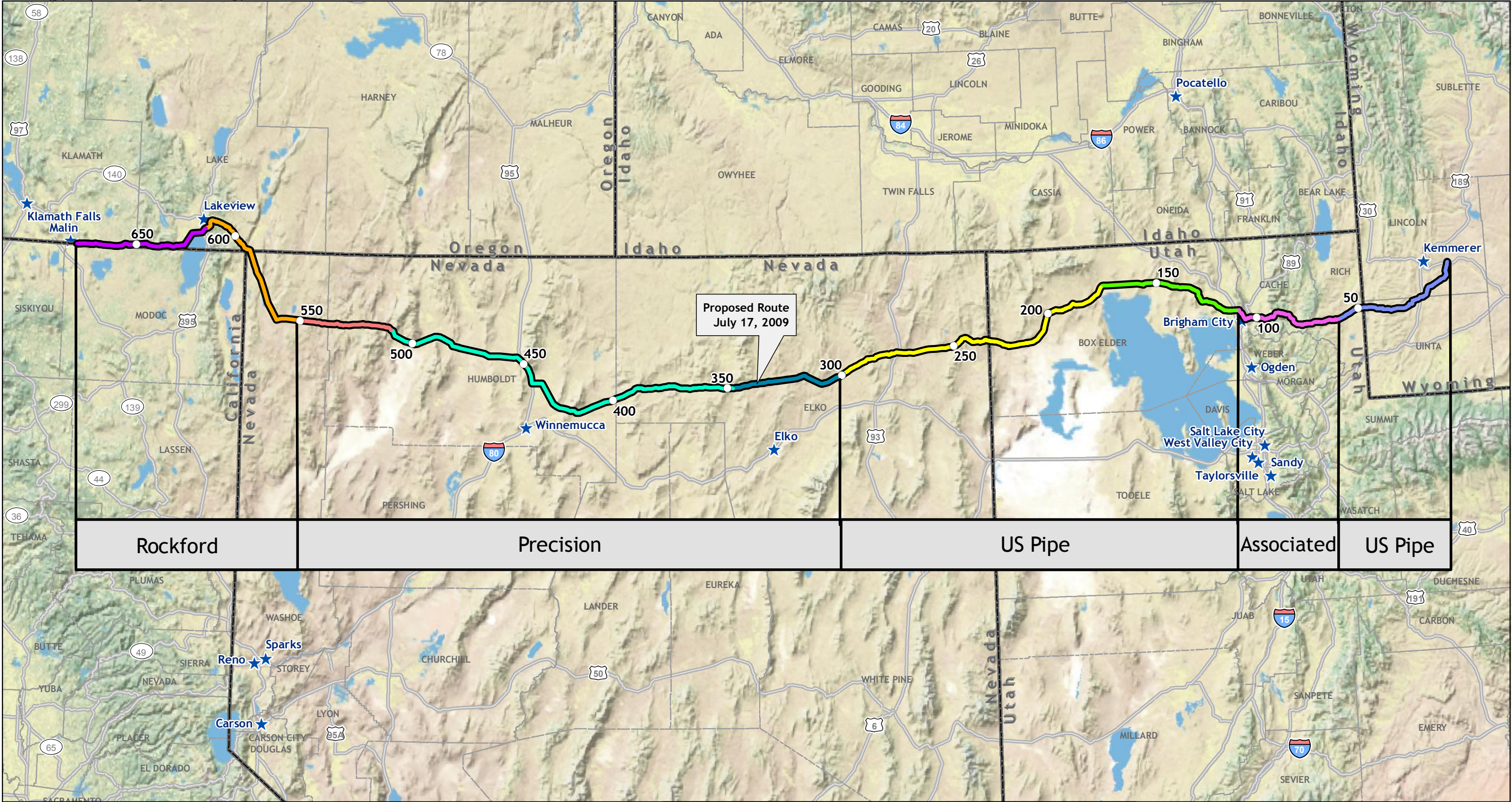
Document	Stipulation/Permit	Adequate (X)	Comments
Utah Department of Natural Resources - Division of Water Rights	Stream Alteration Permit		
Utah Department of Natural Resources - Division of Wildlife Resources	Special Use Permit		
Utah Department of Transportation - ROW Control	ROW Encroachment Permit		
	UTDOT Engineering Review		
Utah Department of Transportation - Statewide Permitting	Statewide Utility License Agreement		
	Statewide Utility License Continuous Bond		
Utah School and Institutional Trust Lands Administration	Industrial Special Use Permit		
Nevada Department of Conservation and Natural Resource; Division of Wildlife	Protected Wildlife Species Take Permit		
Nevada Division of Environmental Protection - Bureau of Water Pollution Control	Temporary Discharge Permit for Hydrostatic Discharge and Construction Dewatering		
	Onsite Sewage Disposal System Application		
	Storm Water Discharge Permit		
	Section 401 Water Quality certificate		
	Temporary Work in Waterways Permit		
Nevada Division of Environmental Protection - Bureau of Air Pollution Control	Air Operating Permit and Permit to Construct - Wieland Flats Compressor Site		
	Surface Area Disturbance Permit (Dust)		
	Air Operating Permit - Desert Valley Compressor Site		
Nevada Department of transportation	R/W Occupancy Permit		
	Access Approach Permit - Wieland Compressor Station		
	Excavation and Encroachment Permit		
	Temporary Occupancy Permit		
Oregon Department of Environmental Quality - Water Quality Division	Individual Water Pollution Control Facility Permit for Hydrostatic Discharge and Construction Dewatering		
	1200 C Construction Storm Water General Permit		

Appendix C Ruby Compliance Checklist

Document	Stipulation/Permit	Adequate (X)	Comments
Oregon Department of Fish and Wildlife	Oregon Endangered Species Act; ORS 564 - Incidental take Permit		
	Fish Passage		
	In Water Blasting Permit		
Oregon Department of Transportation	Application for State Highway Approach		
	Application or Permit to Construct Pipeline		
	Permit to Preform Operation within the Right of Way		
Oreogon Department of State Lands - Wetlands/Waterways Division	Joint Removal-Fill Permit - 196.795-990, OAR 141		

Attachment D: Construction Spreads

Spread	Location	Facilities	Length (mi)	Area (ac)	Work Windows
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					



Construction Spreads

- | | | |
|----|----|---|
| 1A | 3 | 6 |
| 1B | 4A | 7 |
| 2 | 4B | |
| | 5 | |

Environmental
Mile Post (Approx)

City

County Boundary

State Boundary

Major Highway



0 50 100
Kilometers

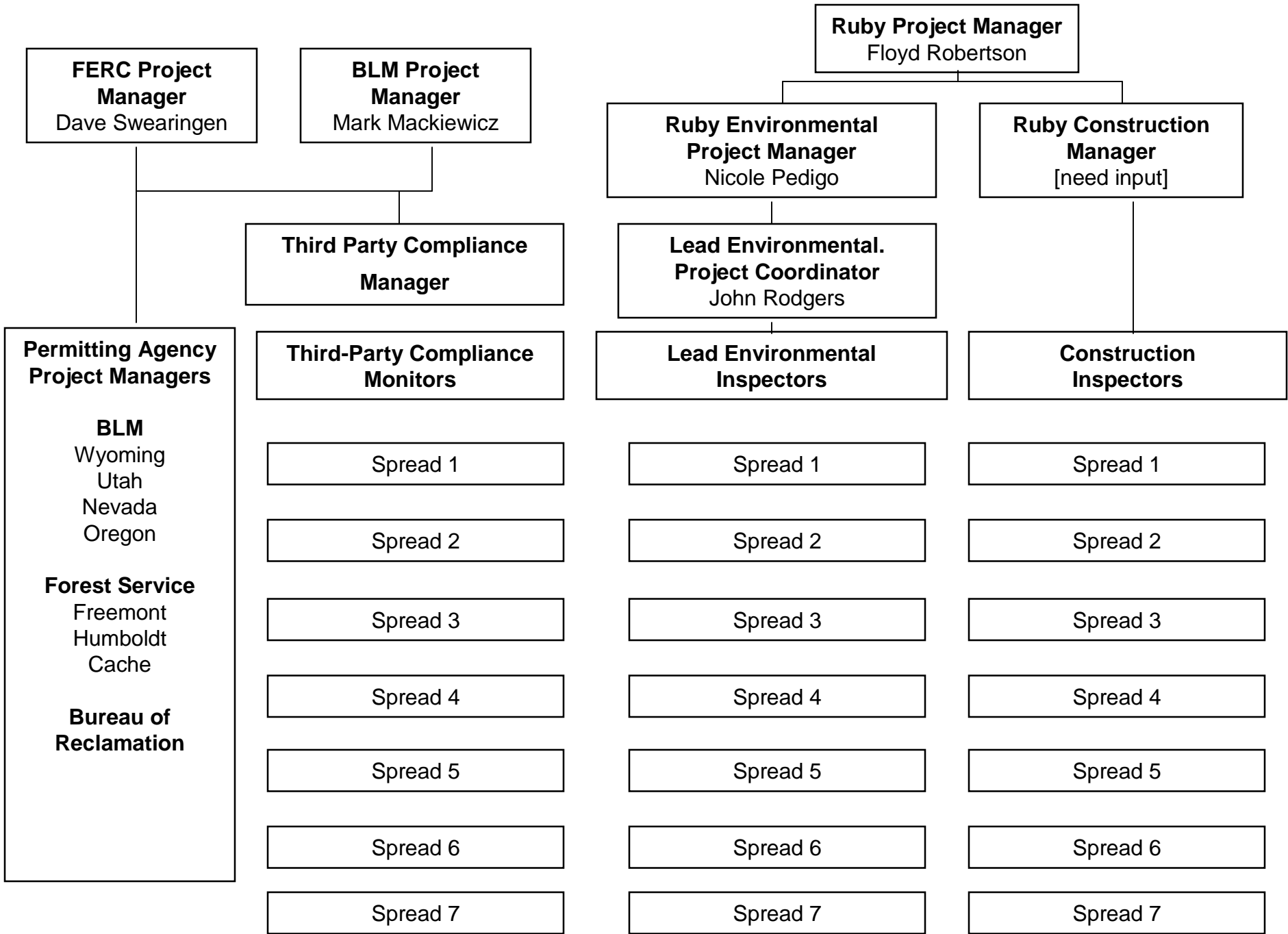
0 50 100
Miles

Appendix D

Construction Spreads

RUBY PIPELINE PROJECT

Attachment E: Compliance Organization Chart



Attachment F: Compliance Program Contacts

Appendix F Compliance Program Contacts

Ruby Management Team

[illegible]

Appendix F Compliance Program Contacts

Ruby Management Team

NAME	TITLE	CELL	OFFICE	E-MAIL
	Lead Environmental Inspector			
	Lead Environmental Inspector			
Roster, Noreen	Lead Biologist	360.901.0625	503.248.5600	nroster@ene.com
Ferraro, Tom	EI Project Manager	801.573.6104	801.990.3320	TFerraro@ene.com
Montgomery, John	EI Contract Manager	503-720-8565	(503) 248-5600	JMontgomery@ene.com
EPG (Cultural Resources)				
Dobschuetz, Kris	Lead Archaeologist on Project	602.463.5843	602.956.4370 Ext 103	kdobschuetz@epgaz.com
Agency Contacts				
Swearingen, Dave	FERC Project Manager			David.Swearingen@ferc.gov
Mackiewicz, Mark	BLM Project Manager			Mark_Mackiewicz@blm.gov

Attachment G: Sample Daily Environmental Daily Inspection Report

RUBY PIPELINE PROJECT

DAILY ENVIRONMENTAL INSPECTION REPORT

Name: _____ Employee Number: _____
 Date : _____ Time: _____ Crew: _____ Foreman: _____
 Spread: _____ Station (Begin/End): _____ to _____ MP (Begin/End): _____ to _____
 Activity Observed: _____ Photos: ☐ No ☐ Yes, list: _____

ACCEPTABLE AREA

Site Conditions:

Weather Conditions (Clear, Cloudy, Partly Cloudy):	
Precipitation (None, Light Rain, Rain, Heavy Rain, Snow):	
Wind (None, Light Breeze, Windy, Heavy Wind):	
Temperature (°F):	
ROW Conditions (Good, Dry, Wet, Saturated):	

Inspection Due Diligence Checklist:

ROW Limits Maintained:	<input type="checkbox"/> Yes
Plans/Procedures Followed:	<input type="checkbox"/> Yes
Stormwater Plan Followed:	<input type="checkbox"/> Yes
Measureable Rainfall in Area:	<input type="checkbox"/> Yes
Weed Management Plan Followed:	<input type="checkbox"/> Yes
Topsoil/Spoil Segregation Maintained:	<input type="checkbox"/> Yes

Restricted Areas Properly Handled:	<input type="checkbox"/> Yes
Refueling/Storage Done Properly:	<input type="checkbox"/> Yes
Signage Properly Placed:	<input type="checkbox"/> Yes
Erosion/Sediment Controls Installed/Maintained:	<input type="checkbox"/> Yes
Line List Conditions Implemented:	<input type="checkbox"/> Yes
Workspace Clean and Debris Picked Up:	<input type="checkbox"/> Yes

Comments:**Compliance Level:** ☐ Acceptable ☐ Unacceptable

Inspector Affirmation: ☐ I affirm that the above observations are correct to the best of my knowledge.

RUBY PIPELINE PROJECT

DAILY ENVIRONMENTAL INSPECTION REPORT

UNACCEPTABLE AREA (Problem Area, Non-Compliance, or Serious Violation)

Time: _____ Crew: _____ Foreman: _____

Station (Begin/End): _____ to _____ MP (Begin/End): _____ to _____

Quick Summary: ☐ Problem Area ☐ Non-Compliance ☐ Serious Violation

Summary:

Photos:

Specification Source:

<input type="checkbox"/> Ruby's Plan (upland)	<input type="checkbox"/> Dust Control Plan	<input type="checkbox"/> Blasting Plan
<input type="checkbox"/> Ruby's Procedures	<input type="checkbox"/> Noxious and Invasive Weed Plan	<input type="checkbox"/> Sensitive Resource Mitigation Plan
<input type="checkbox"/> SWPPP	<input type="checkbox"/> Restoration and Revegetation Plan	<input type="checkbox"/> _____
<input type="checkbox"/> SPCC Plan	<input type="checkbox"/> Fire Prevention Plan	<input type="checkbox"/> _____
<input type="checkbox"/> Waste and Spill Management Plan	<input type="checkbox"/> Hydrostatic Plan	

Comments:

Recommended Action:

☐ Follow-up is Required – Acceptable Resolution Date: _____ Timeline: ☐ 24hrs ☐ 48hrs ☐ 72hrs

Attachment H: Sample Weekly Environmental Inspection Report

WEEKLY ENVIRONMENTAL INSPECTION REPORT

Start Date: _____ End Date: _____
 Preparer: _____ Title: _____

I. ENVIRONMENTAL TRAINING

Man Hours: _____ / _____
 this week to date

People: _____ / _____
 this week to date

II. WATERBODY CROSSING SCHEDULE

Spread/ Facility	Waterbody Name	MP/ Location	Crossing Method	Commencement Date	Status	Comments

III. CONSTRUCTION PROGRESS, PLANNED ACTIVITIES, AND SCHEDULE CHANGES

Spread/Facility: _____ MPS: _____ to _____

Construction Progress:

Activity	% Complete
Clearing	%
Grading	%
Ditching	%
Stringing	%

Activity	% Complete
Lowering-In	%
Backfill	%
Cleanup	%

Comments: *Construction Progress*

Next Week Planned Activities/Schedule Changes:

WEEKLY ENVIRONMENTAL INSPECTION REPORT

IV. ~~PROBLEM AREAS~~ ^{or Non-} ^{Serious Violation} COMPLIANCE TRACKING

A total of ~~problem areas~~ ^{and} non-compliance ^{or} serious violations were reported during this reporting period (see Table 1).

V. VARIANCE TRACKING

A total of _____ variances were requested during this reporting period (see Table 2).

VI. LANDOWNER COMPLAINT RESOLUTION TRACKING

A total of _____ landowner complaints were recorded during this reporting system. Resolutions to these complaints are provided in Table 3.

VII. AGENCY CORRESPONDENCE RECEIVED

Agency correspondence is included in Appendix A.



Weekly Report No.: XX
Docket No.: XXXX-XX-XXX

WEEKLY ENVIRONMENTAL INSPECTION REPORT

Table 1 Problem Areas/Compliance Tracking

[illegible]

Attachment I: Sample Daily Compliance Monitoring Report

DAILY COMPLIANCE MONITORING REPORT

Compliance Monitor Name: _____

Date: _____ Time: _____

Compliance Type:

- ☐ Communication
☐ Acceptable
☒ Incident *Area*
☐ Minor Problem
☐ Non-Compliance
☐ Serious Non-Compliance
☒ Other: _____

Construction Activity:

- ☐ Clearing
☐ Grading
☐ Ditching
☐ Stringing
☐ Lowering-In
☐ Backfill
☐ Cleanup

LOCATION INFORMATION

MP: _____ Begin Station No.: _____ End Station No.: _____

Landowner: _____ Alignment Sheet No.: _____

RESOURCE INFORMATION (check all that apply)

- ☐ T/E or T/E Habitat
☐ Landowner Issue
☐ Surface Water (streams, rivers, playas, springs, wetland)
☐ Paleontological
☐ Cultural Resources

ACTIVITIES OBSERVED/COMMENTS/SUMMARY

DOCUMENT SPECIFICATION

- ☐ Plan ☐ Procedures ☐ Permit-specify: _____
☐ SSWPP ☐ SPCC ☐ Other-specify: _____

Photo Numbers: _____

Follow-up Required: ☐ No ☐ Yes

Attachment J: Sample Weekly Compliance Monitoring Report

Start Date: _____ End Date: _____
Preparer: _____ Title: _____

Spread/Facility: _____

[illegible]

See Table 1.

See Table 2 and Table 3.

Attachment K: Variance Request Form

Urgency Level: _____ FERC Approval Reference No.: _____

I. LOCATION INFORMATION

Landowner Approval: _____ Other Agency Jurisdiction: _____

II. LAND COVER/LAND USE

Net Acreage Affected: Net PFO: Net PEM: Net PSS:

III. VARIANCE INFORMATION (to be completed by the LEI or EPC)

Variance Justification:

IV. SURVEY INFORMATION (to be completed by the EPC)

Proof of Survey Clearance:

V. REQUIRED SIGNATURES

Lead Environmental Inspector			<input type="checkbox"/> Yes <input type="checkbox"/> No
------------------------------	--	--	--